

From: <plv1953@comcast.net>
To: <sepacenter@wadnr.gov>
Date: Mon, Sep 22, 2003 8:34 PM
Subject: Lake Whatcom DEIS

Dear Sirs, I would like to comment on the Lake Whatcom DEIS.
I feel that the logging on the 15,700 acres of forested state trust lands in
and adjacent to the Lake Whatcom watershed should be banned.

OR

If logging continues around Lake Whatcom the DNR should leave more than 8 trees
per acre, and harvest every 80 years instead of 60.

Hopefully a wise decision will be made and we won't have to look at ugly clear
cut mountain tops around the lake.

Thank you for reading my comments.

P. Villhauer

From: Phil Kelly <lonearrngr@nas.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Sep 24, 2003 2:48 PM
Subject: DEIS --preferred alternative plan

Washington State DNR
 To whom it may concern:

The other evening, I attended a meeting in Bellingham at Bledel Donovan park for the express purpose of learning about the so called Lake Whatcom Landscape Plan" and the recently issued " Draft Environmental Impact Statement" ,or acronymically the DEIS ..

Realizing that this was to be a very complex subject, I secured one of the printed statements to review later. I'm glad I did, because the following hour and a half, I was bombarded with bureaucrat-speak, power pointed into numbness ,and consistently exposed to the euphamism "management" ..which very clearly (after my initial exposure to the "DEIS preferred Alternative" plan) really meant logging contracts, and an obvious bias toward the commercial interests at the expense of the envirotnmental ones.

#1. The "preferred alternative" (table.pg 42) opens up 53% of the Whatcom area to commercial logging, probably by "the common harvest method used in the project has been regeneration clearcuts..intermediate harvests (?)of cedar and Douglas fir polesare practiced where specific site and stand conditions permit" (pg 64)

#2. Alternative 3 (ibid) while offering some environmental improvement , STILL opens up more than a third of the same area to the above cited commercial uses.

I question whether those of us who choose to live in the Whacom /Bellingham area for it's obvious environmental beauty and advantages were fairly represented in the "scopng " process earlier on in relation to the industrial and developer interests.

and was this so- called "preferred alternative " presented to those of us there as a polite bureaucratic fait accompli? .. a "done deal" ? .."get used to it, we're gonna clear cut more than half of the timber in the area, wheter you like it or not? "

or will we, as tax paying citizens , get to VOTE on this matter?

Someone at the meeting brought up that by preserving the environmental aspects would eventually make the land more valuable and thus actually increase the value of the tax base (albeit a lot more slowly than just chopping down the lumber ,and selling it off ..) This suggestion made sense to me.

As I said earlier, this is a complex document , and I'm just getting started trying to decipher the intent therein. Being a professional music composer, wading through the terminology and the mass of geological and hydrological

enviro-speak is a long hard slog

..but I'll do it

..and I may be back.

Sincerely:

Phil Kelly
Bellingham WA
lonearrngr@nas.com

CC: Steve Sample <sosmus@callatg.com>, Brenda Sample <bbsample@callatg.com>,
<letters@bellinghamherald.com>

Holly Coble
1535 Sudden Valley
Bellingham, WA 98229

Department of Natural Resources

9/26/03

Re; DEIS – Lake Whatcome Landscape Plan

I have attended two of the DEIS meetings and I appreciate the opportunity to give input. I was quite distressed to hear that the preferred alternative was the original Alternative #2. I am strongly against this alternative and would ask that the committee consider my vote for Alternative #3.

This is a beautiful piece of property that is quite unique in the world and I hate to see it destroyed for the sake of additional revenue. I realize that many of the roads that would be built would be abandoned but I've seen abandoned roads and they never really go away.

Again, please change your mind and use Alternative #3.

Thanks and regards,
Holly Coble

RICHARD R. HORNER, PH.D.

230 NW 55TH STREET
SEATTLE, WASHINGTON 98107

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October 2, 2003

Mr. William J. Wallace, Regional Manager
Washington State Department of Natural Resources
Northwest Region
919 North Township Street
Sedro-Wooley, WA 98284-9384

Dear Mr. Wallace:

At the request of the Northwest Ecosystem Alliance I reviewed the Draft Environmental Impact Statement ("DEIS") for the Lake Whatcom Landscape Plan ("the Plan". My review concentrates on the plan elements pertinent to my background and experience, which include water resources (wetlands, streams, and the lake), water quality and quantity, sediment-generating processes, and prevention or minimization of soil loss. After summarizing my background and qualifications in these areas, this letter presents my assessment of the DEIS.

PROFESSIONAL BACKGROUND AND QUALIFICATIONS

I have 37 years of professional experience, 33 teaching at the college and university level. For the last 26 years I have specialized in research, teaching, and consulting in the area of storm water runoff and surface water management. I received a Ph.D. in Civil and Environmental Engineering from the University of Washington in 1978, following two Mechanical Engineering degrees from the University of Pennsylvania. Although my degrees are all in engineering, I have had substantial course work and practical experience in aquatic biology and chemistry. For 12 years beginning in 1981 I was a full-time research professor in the University of Washington's Department of Civil and Environmental Engineering. I now serve half time in that position and have adjunct appointments in two additional departments (Landscape Architecture and the College of Forest Resources' Center for Urban Horticulture). While my research and teaching continue at a somewhat reduced level, I spend the remainder of my time in private consulting through a sole proprietorship. My full credentials are available upon request.

My research, teaching, and consulting embrace all aspects of stormwater management, including determination of pollutant sources; their transport and fate in the environment; physical, chemical, and ecological impacts; and solutions to these problems through better structural and non-structural management practices. A substantial area within the stormwater management field involving all of these considerations is the understanding of aquatic resource problems

caused by runoff from sites of soil disturbance, like logging roads and other construction projects and the timber extraction sites themselves, and how best to avoid or minimize these problems.

I have conducted numerous research investigations and consulting projects on these subjects. Serving as a principal or co-principal investigator on more than 40 research studies, my work has produced two books, approximately 30 papers in the peer-reviewed literature, and over 20 reviewed papers in conference proceedings. I have also authored or co-authored more than 75 scientific or technical reports. In addition to graduate and undergraduate teaching, I have taught many continuing education short courses to professionals in practice. My consulting clients include federal, state, and local government agencies; citizens' environmental groups; and private firms that work for these entities, primarily in Washington, California, British Columbia, and Oregon but in some instances elsewhere in the nation.

I have been the principal investigator on two extended research projects relevant to the subjects of this letter. I led an interdisciplinary team for 11 years in studying the effects of human activities on freshwater wetlands of the Puget Sound lowlands. This work led to a comprehensive set of management guidelines to reduce negative effects and a published book detailing the study and its results. The second effort, nine years in length, involved an analogous investigation of human effects on Puget Sound's salmon spawning and rearing streams. These two research programs have had broad sponsorship, including the U.S. Environmental Protection Agency, the Washington Department of Ecology, and a number of local governments.

I have been active in the area of construction site stormwater management for approximately 18 years. During that time I have: (1) performed research on the performance of certain best management practices ("BMPs") intended to prevent soil erosion or interdict sediment transport, (2) functioned as an independent mediator on a sensitive road construction project, (3) served on a technical advisory committee for a very large research project of this type, (4) taught numerous courses on the subject, and (5) inspected many construction sites myself. My research pertained to the effectiveness of soil-covering mulches and blankets in preventing erosion and of silt fences and sedimentation ponds in stopping the transport of sediments entrained in runoff beyond the construction site. As a mediator, my responsibility was to reconcile and make judgments and recommendations based on the information coming from the contractor, the sponsoring city road agency, the city's environmental inspectors, independent consultants, and my own observations. On the advisory committee I had an oversight role on behalf of the plaintiffs for a federal court-ordered study sponsored by the California Department of Transportation as defendant. This study measured the effectiveness of 16 mulches and blankets and certain soil preparation techniques. I have taught continuing education courses on construction site pollution control, ranging from a half day to six days in length, more than 30 times to consultants, regulators, and contractors.

I have substantial familiarity and experience with Whatcom County and Lake Whatcom, the physiography and biology of the environment in the vicinity, and the status of stormwater management in the area. In 1993 I served as a mediator on a proposed lakeshore development moratorium among county, water district, and local community representatives. Over the years I have reviewed a number of documents and proposals relating to management of the area's water

resources, most of which directly concerned Lake Whatcom. I presented related testimony to hearings boards on two occasions.

GENERAL ASSESSMENT OF THE DEIS

It is my opinion that the Preferred Alternative fails to apply fully and comprehensively the key objectives stated for the Lake Whatcom Landscape. The specification and analysis of this and any other alternative considered must adhere to the objectives, adopted after deliberation by the legislatively constituted Landscape Planning Committee, and must properly take into account all governing conditions in reaching conclusions. The unique status of a drinking water reservoir warrants strict attention to these objectives in the development, assessment, and adoption of an alternative. The remainder of my letter gives my specific comments on the DEIS and, in the course of doing so, elaborates on these opinions.

SPECIFIC COMMENTS

1. State legislation specifying the Plan states, "On unstable slopes, ... old road reconstruction shall be limited." Under the Preferred Alternative, reconstruction in unstable or potentially unstable locations would be determined according to evaluation by a "DNR specialist." Independence of the DNR's own employee is doubtful in making these sensitive determinations. An inter-jurisdictional committee and external specialists would be able to advance recommendations, but they need only be "considered" and not necessarily followed. The DEIS thus gives no sense of how and to what degree, or even if, the department would "limit" old road reconstruction on unstable slopes. The law further mandates, "Establishing riparian management zones along all [emphasis added] streams ...," without distinguishing among stream types. However, these zones along Type 5 streams can be cut for roads and yarding corridors. Also, buffer widths would be less for stream Types 4 and 5 than for Types 1-3.
2. The first eight objectives for the Lake Whatcom Landscape fit within the scope of this letter. The first objective is to ensure no significant risk from forest management-related mass wasting events. Objectives 2 to 6 and 8 express intentions to "maintain" (or "protect") and "restore" (or "increase") various aquatic resources or conditions supporting resources, specifically:
 - Objective 2—the sediment regime within the range of natural variability;
 - Objective 3—riparian and wetland habitat;
 - Objective 4—the forest hydraulic regime within the range of natural variability;
 - Objective 5—water quality;
 - Objective 6—diversity of habitat conditions; and
 - Objective 8—soil productivity and health.

Objective 7 is to retain features that support mature forest functions. As subsequent comments show, strategies under the Preferred Alternative are insufficient to achieve these objectives, particularly with respect to restoration. The Washington State Department of Health in its November 27, 2001 letter included in the Preliminary Draft Environmental Impact Statement (PDEIS) appendices says that, "Site-specific recommendations identified by that process [the Lake Whatcom Landscape Plan advisory committee] related to enhancing water quality should also be considered." I would go farther to say that the excellent objectives set by the committee should be an absolute foundation for guiding the EIS process and devising the management strategy for the watershed's forests.

3. The only provisions of the Preferred Alternative that could be considered to be restorative are, "Mitigation work on orphaned roads ... where a clear risk to public safety of potential for resource damage exists ..." (under Objective 2) and a strategy to, "Identify, prioritize, and replace fish-blocking culverts ..." (under Objective 6). However, neither plan comes with a commitment to a specific level or timing of action, according to which a certain amount of restoration would occur. The first provision appears to address each instance individually and takes no account of the cumulative effects of past poor practices. Blocking culvert replacement would be carried out only, "... during planned management activities or during implementation of the Road Maintenance & Abandonment Plan." There is no commitment to replace all blocking structures expeditiously, as there should be to achieve true fish passage restoration. Alternative 3, in contrast, gives important commitments to orphaned road mitigation and blocking culvert replacement within 3 years of the Plan's adoption.
4. DNR trust lands constitute 48 percent of Lake Whatcom's watershed and produce 35 percent of the lake's inflow, 96 percent of that quantity as surface runoff. This large presence gives the department the greatest controlling influence on the ecosystem and drinking water quality of any jurisdiction, a position demanding its responsibility in ensuring no further degradation originating in its zone. Since deterioration has occurred and is well documented, DNR is further obligated to perform restoration projects to reverse degradation trends. It has always been exceptionally ironic to me that, while much of even this rich nation subsists with relatively poor quality water sources requiring massive and costly treatment to reach minimal potable quality, the Whatcom County community has what until recently was a high quality source, which it has allowed to degrade for the short-term gains produced by allowing more and more intrusions into the watershed.
5. In the face of DNR's key role in the watershed and its hydrology and the recent history of water quality and ecological losses, the Preferred Alternative would allow 52.7 percent (8276 of 15707 acres) of the trust lands definitely to be open to timber harvesting, while up to an additional 19.7 percent (3098 of 15707 acres) in unstable areas could be logged, for a total of more than 72 percent of DNR's property as an economic zone. The DEIS states that clear cutting (euphemistically, "regeneration harvesting") would account for 47.3 percent of the logging (43 of 91 acres harvested annually). Subsequent research by Northwest Ecosystem Alliance revealed that DNR's actual plan for harvesting differs from this statement, with 75 of 86 acres harvested annually to be clear cut in the period 2001-2020, rising to 97 of 121

acres per year during 2021-2040. According to this plan, then, an average of 104 acres per year would be harvested in the 40-year period, of which an average of 86 would be clear-cut (representing 82.7 percent of the total cut).

With its 48 percent ownership of the watershed, that means that as much as 35 percent of the entire lake catchment could eventually be mostly stripped of forest cover. If the average clear-cutting pace prevails overall, ultimately 28.6 percent of the lake's watershed could be clear cuts (based on the plan differing from the DEIS), or 16.3 percent taking the figures in the DEIS. The DEIS does not report how much of the DNR land has been logged (and the breakdown of clear cut and thinning) up to the present, a point at which Lake Whatcom has already suffered considerably; but the amount surely would be dwarfed by what could be cut in the future. The document takes pains to make the point in several places that impacts would not be the same as in the past with more environmentally benign practices in the future. However, even if improved procedures decrease pollutant yields and other forms of environmental harm, greater presence is very likely to undo much or all of the benefits and lead to undiminished, or even increased, burdens on the aquatic resources.

6. The DEIS notes that, under conditions characteristic of the area, substantial overland flow occurs only when the forest duff is removed, as it would be in road building and highly disruptive logging operations. As noted below, the increased surface runoff to the streams and lakes would carry with it eroded sediments and the nutrients they contain. The Preferred Alternative does not outline sufficient improvements in practices to counteract the proposed great expansion of its economic activities.
7. The Preferred Alternative is predicated on the construction of 43 miles of new logging roads, doubling the 44 miles now active and adding to the 42 miles of orphaned roads (representing overall a 50 percent increase in total road disturbance over the present state). It is stated that only 35 miles of roads will remain permanently active, but without any indication of how abandoned roads will be treated. They will either not be restored or, seemingly at best, be subject to the very weak restoration commitment given under Objective 2 (see comment 3). Grizell, in his 2001 report included in the PDEIS appendices, stated that almost all forest-related surface erosion is associated with forest roads. While better road building and maintenance practices might stem some of the erosion that occurred in the past, it is most improbable that methods can be improved enough to prevent a substantial net increase associated with an approximate doubling of the road presence.
8. Grizell additionally noted that orphaned forest roads are the primary trigger of mass wasting episodes on timber harvesting lands. Thus, DNR should institute a strong program to mitigate these sources quickly, instead of taking the non-committal approach of the Preferred Alternative, which abrogates its charge under Objective 1. Its obligation to do so is heightened in the context of its plans to expand logging and the road system so much, in that mitigation of the orphaned road sources of sediment contribution to the lake could compensate, at least in part, for the increases that will follow its expansion. Mass wasting is estimated to account for sediment yield 2.3 times the background amount, a far greater and hence more crucial anthropogenic source to bring under control than surface erosion.

9. The preceding comments have dwelled on the proposed extension of disturbance and absence of restoration commitments. This and subsequent comments are concerned with environmental factors that make these faults of special concern. Several physiographic features of the area are highly conducive to relatively large amounts of sediment and related pollutant generation associated with disturbance.
10. First, the DNR lands are very wet, with an annual average of up to 80 inches of precipitation, which is potential surface runoff when tree interception, forest duff storage, infiltration, and evapotranspiration opportunities are gone. Furthermore, a large share of the trust lands lie in the "rain-on-snow" zone (approximately 1600 to 2600 ft in elevation). This zone can receive either snow or rain, depending on temperature, and is prone to very large runoff volumes and peak flow rates caused by a lot of rain falling on accumulated snow. Grizell attributed the greatest potential for hydrologic effects to this condition.
11. Secondly, the area's soils are relatively thin and composed of cohesionless gravels, sands, and fines. Such soils produce a rapid surface runoff response to precipitation without duff and the other features and mechanisms of a Pacific Northwest forest that largely attenuate runoff production. When exposed to precipitation and runoff, these soils are highly erosive. Once in transport, the finer fractions settle reluctantly. All of these factors make substantially increased sediment transport to the lake likely with more roads and timber harvest.
12. Some 50 streams feed into Lake Whatcom, the majority flowing from the DNR lands via steep ravine courses. High velocity flow on steep gradients without flood plains produces great shear stresses that erode the beds and banks, adding to the sediment load and offering no opportunity for settling and sediment storage. Far worse, most of the mass wasting occurs in these channels.
13. Grizell acknowledged the relatively low large woody material presence in the Lake Whatcom feeder streams, generally a consequence of past debris torrents that swept logs away. The attendant destruction of the riparian zones, along with past logging up to streams, provides a poor source of new wood. This feature also inhibits sediment settling and storage. Overall, then, meteorology, plus erosive soil characteristics and mass wasting vulnerability, plus efficient sediment transport add up to a high sediment input to Lake Whatcom when its watershed is disturbed.
14. The issue most threatening to drinking water quality from the Lake Whatcom source is increased phosphorus loading, which stimulates algal growth and sets in motion the whole damaging process of eutrophication. Larger algal production not only means more plankton in the water, but generally also leads to a change in forms from predominantly diatoms at low enrichment, to filamentous green algae, and then to blue-green types at the highest nutrient concentrations. This succession has many negative ecological and aesthetic effects, but from the drinking water standpoint, it can mean a greater filtering requirement to remove suspended matter, treatments to adjust unpleasant tastes and odors created by algae, and,

most worrisome, health-threatening organochlorine chemical production when disinfecting chlorine contacts organic compounds in algal cells. Some of these by-products are recognized carcinogens, and others may be.

15. Large algal biomass dying and sinking to the bottom of the lake decreases dissolved oxygen as bacteria use it up in the decay process. A fully or nearly anaerobic state permits chemical reactions that release into soluble forms of both phosphorus and mercury that had been sequestered with the lake's sediments. Phosphorus release accelerates eutrophication. Mercury is a virulent toxin to all life and thus another concern in drinking water. The situation described is well known to exist in Basin 1 of Lake Whatcom, from which drinking water is drawn. Phosphorus and mercury are two of the four water pollutants (along with PCBs and bacteria) identified by the Washington Department of Ecology as leading matters of concern in the lake.
16. Phosphorus is a constituent of soil and vegetative tissue. It enters water when runoff erodes soil and when both soil and vegetation enter water through mass wasting. These additions greatly raise phosphorus concentrations. The PDEIS acknowledges, for example, that Smith Creek experienced an approximate ten-fold increase following a mass-wasting event. When it is considered that the flow would also have been much elevated, and that loading equals concentration times flow volume, the total phosphorus mass entering the lake must have been orders of magnitude above background levels during an equivalent period. In fact, 43 percent of the entire sediment loading expected from forestry activities over 90 years, and presumably a similar amount of phosphorus export, was estimated to be from mass wasting during one event in January 1983.
17. Through the course of the EIS process, the proponent has attempted to make several points establishing that, in its view, all of the issues just recounted amount to little with respect to drinking water and ecological concerns in Lake Whatcom, opining that: (1) large inputs occur rarely, for example only during an 80- to 100-year frequency event like that in January 1983; (2) this pollution of the lake and other episodes in the past were functions of poor practices and will not recur, at least at such magnitude, with better operations; (3) these additions are remote from the drinking water intakes, into the voluminous Basin 3, isolated from the remainder of the lake by a sill; (4) phosphorus export mainly occurs in the winter, when algae are growing little; and (5) sediment phosphorus is already so abundant that new additions will not increase releases during low oxygen conditions. These arguments are speculations that are disputable through other speculations or refuted by logic. Actually, with the high stakes existing with this resource, the proponent should measure and thoroughly analyze these points instead of speculate.
18. Relative to the point about rarity, the event in question was responsible for sediment and related pollutant loading that would have occurred naturally only over decades (43 percent of 90 years contribution would take about 40 years in an undisturbed watershed). Furthermore, the mass wasting producing the sediment loading was triggered mostly by orphaned roads, which will not necessarily be remeditated soon, or ever, under the Preferred Alternative. Moreover, something like the January 1983 event, although probably smaller, happened less

than 8 years later, in November 1990. It surely again delivered to the lake a quantity of sediments that would have only entered over years at a natural rate, if the triggering abandoned roads were not there or were restored to forest. This period of time, in the 1980s and early 1990s, on the whole had less than average precipitation in most years, and hence may not even represent a worst case.

19. Regarding the second point enumerated in comment 17, I have already argued above that the mitigating effects of better future practices may very well be lost with many more miles of roads and areas disturbed by logging. The only way that the share of deterioration from forest exploitation can be reversed is through some combination of restoration of past damage, limitation on new disturbance, and implementation of substantially improved practices to mitigate what new disturbance does occur. This philosophy is embedded in the objectives but was not applied in developing the Preferred Alternative. There was no analysis of what is necessary to stop degradation and what strategies of restoration, limitation, and better practices can contribute to this end.
20. Concerning the third point about remoteness from water intakes, the proponent has admitted that the large hydraulic loading during the big 1983 and 1990 precipitation events pushed water from Basin 3 into the remainder of the lake, at a time of massive pollutant inputs. Also, Basin 3 is itself a resource, and the state has an anti-degradation policy, although a weak one little known or honored. The DEIS envisions policies applying for generations (a term of up to 140 years). Is the implication that it is fine to allow preventable contamination over all of those years until the condition of Basin 3 approximates that of Basin 1?
21. The fourth point enumerated under comment 17 ignores the realities of lake hydrology. In a body of water that does not exchange its contents for years, it is much more crucial what the contaminant loading is in relation to its flushing rate and morphometry than what happens in any one year.
22. The final point implying that things are already so bad that the DNR's plans for taking out much more timber could not make them worse is a unique argument in my experience. Lake trophic status is rated on degree of enrichment from oligotrophic (low enrichment), to mesotrophic (medium), to eutrophic (high), and in extreme cases to hypereutrophic. Lake Whatcom is by no means eutrophic yet, and could get much worse with carelessness. Future phosphorus additions will contribute to increased water column concentrations, supporting algal blooms in the short-term. It is inconceivable to me that all phosphorus binding sites in the sediments are consumed or isolated from contact with water column phosphorus. I strongly believe that sediment phosphorus build up will continue unless inputs decline. I further believe that phosphorus releases from sediments will grow as low oxygen conditions extend in time and space.
23. The Preferred Alternative would perpetuate a poor practice from the past, allowing yarding of logs across streams. It is difficult to trust that the future will be bright with good practices when a non-essential environmentally harmful one is retained.

Mr. William J. Wallace

October 2, 2003

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24. The Preferred Alternative provides no buffer zones for wetlands smaller than 0.25 acre in area. Nowhere is it given how much of the total wetlands habitat is provided by these smallest wetlands, but it may be a considerable fraction. Small wetlands offer primary productivity, plant biodiversity, and habitat for at least the smaller consumers in the food web (invertebrates and amphibians). Amphibians are in regional and worldwide decline, in part because of habitat disappearance, which is significantly aggravated by cumulative small individual losses. There was no analysis of how much impact of this type the Preferred Alternative will produce.

In conclusion, the Preferred Alternative omits readily available and fully feasible aquatic resource protection strategies. Worse, its restoration strategies are very few, ill-defined, and lacking any solid commitments. With such a valuable natural and societal resource at stake, I advise the DNR to adopt a philosophy of first stopping and then soon reversing lake degradation originating its territory. I recommend that the department apply that philosophy initially by maximizing restoration and implementation of a full suite of state-of-the-art forest practices, and then by setting its harvest targets and road extensions within boundaries that will ensure cessation of deterioration from its operations. The Preferred Alternative falls far short of these standards and, to be acceptable, must be greatly enhanced in terms of protections and, even more so, restoration commitments. I would be pleased to answer any questions you may have and invite you to contact me if you wish.

Sincerely,

Richard R. Horner, Ph.D.

From: "Candace McKenna" <candacem@microsoft.com>
To: <sepacenter@wadnr.gov>
Date: Fri, Oct 3, 2003 9:47 AM
Subject: Impact of logging on the Lake Whatcom watershed

SEPA Center
Washington State Department of Natural Resources
PO Box 47015
Olympia, WA 98504-7015

To whom it may concern:

I am writing to ask that, for the protection of the Lake Whatcom watershed and to avoid erosion, that no road building or logging occur on potentially unstable slopes. I support Mayor Asmundson's request for logging proceeds to pay for an oversight committee as described in his and City Council President's Borneman's letter. I further request that no oil and gas exploration be allowed in this area since it is the source of Bellingham's drinking water and merits the highest level of protection. I would also like the plan to address the nature of increased logging volume that is planned and its potential environmental impact.

Thank you very much,

Candace McKenna

425 9th Street

Snohomish, WA 98290

Candacem@microsoft.com

From: <hoelzen@memes.com>
To: <sepacenter@wadnr.gov>
Date: Fri, Oct 3, 2003 5:19 PM
Subject: Comments to Lake Whatcom DEIS

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan. As a resident of Sudden Valley, I am intimately affected by and concerned with this issue. There are several changes to the preferred alternative that I believe will protect our drinking water and preserve the watershed environment.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. First and foremost, I am writing to ask that the DNR change their preferred alternative to allow no oil and gas exploration in the Lake Whatcom watershed. Additionally, it is important that no road building or timber harvest be allowed on unstable slopes. The agency must have in place a system for ongoing monitoring of the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results. A strong, inter-jurisdictional committee with the authority to stop risky forestry practices would help to ensure appropriate environmental protections.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Marcia Hoelzen
hoelzen@memes.com
294 Sudden Valley
Bellingham, WA 98229

cc:

From: <dlien2@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Fri, Oct 3, 2003 5:25 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
David Lien
dlien2@yahoo.com
430 E. Cheyenne Mt. Blvd., #21
Colorado Springs, CO 80906

cc:

From: <aprilj17@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Fri, Oct 3, 2003 5:26 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

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I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
April Claxton
aprilj17@yahoo.com
2629 Grant St
Bellingham, WA 98225

cc:

From: <nickd@spie.org>
To: <sepacenter@wadnr.gov>
Date: Fri, Oct 3, 2003 5:27 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

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I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Nick Duckstein
nickd@spie.org
312 Willow Ct N
Bellingham, WA 98225

cc:

From: <chickenlenny@webtv.net>
To: <sepacenter@wadnr.gov>
Date: Fri, Oct 3, 2003 5:27 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Leonard Larson
chickenlenny@webtv.net
1304 15th S
Seattle, wa 98144

cc:

From: <JBanks@aol.com>
To: <sepacenter@wadnr.gov>
Date: Sat, Oct 4, 2003 11:09 PM
Subject: Lookout Mountain/SEPA File # 02-091300

Dear DNR:

May this letter be received in good faith between DNR and Jeffrey and Teresa Banks of Glenhaven.

As licensed treatment foster parents with DSHS, and proud parents of two young (20 months & 5 years) children, we sincerely appeal to DNR to see all the protections in alternative 3 incorporated into alternative 2.

We moved our family from Red Mountain Rd. in Maple Falls, WA to Glenhaven in June of 1996 because of the 1000 acre clear-cut which truly compromised our home and personal health and safety. Our property line was on the South west parameter. Our 50-80 year old trees were exposed to incredibly high winds which resulted in property damage. Suffice it to say -- our fear for our lives is genuine, valid and with merit because we live on West Alder Drive. Our two large lots and home is located directly below Lookout Mountain State Trust Land.

Beside raising foster/biological children, we are providing in home health care for our mother who has suffered from a severe stroke which has paralyzed much of her left extremities/speech.

Please realize our quality of life as a working class family would be preserved by the protections stipulated in Alternative 3.

Thank You

Very Truly,
Jeffrey & Teresa Banks

CC: <hansen518@earthlink.net>

From: <Bothrhodes@aol.com>
To: <sepacenter@wadnr.gov>
Date: Sun, Oct 5, 2003 5:47 AM
Subject: Comment on DEIS

To whom it may concern,

I do not support any of the three alternatives in the Lake Whatcom Landscape Plan. I would encourage, instead:

1. A clear statement of the plan, and its environmental impacts.
2. No harvesting on unstable slopes.
3. No consideration of oil or gas exploration in the Lake Whatcom watershed.

Sincerely,

Alan Rhodes
1211 38th Street
Bellingham, WA 98229

From: <goldsttawh@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 10:57 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

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The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Adam Goldstein
goldsttawh@yahoo.com
2712 Clearwater Ct
Bellingham, WA 98229

cc:

From: <piper@cc.wvu.edu>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 10:54 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Paul Piper
piper@cc.wvu.edu
3731 D'linda St
Bellingham, WA 98226

cc:

From: <jeff23purdue@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 10:54 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Jeff Purdue
jeff23purdue@yahoo.com
2801 Elm
Bellingham, WA 98225

cc:

From: <leslie_geller@hotmail.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 10:56 AM
Subject: Lake Whatcom comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

I would like to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I implore you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

I do not live in the area affected by the watershed but I am a concerned citizen of King County who believes that we all should do whatever we can to protect the environment, and I'm strongly opposed to destructive logging practices.

Sincerely,
Leslie Geller
leslie_geller@hotmail.com
15102 SE 43rd St.
Bellevue, WA 98006

cc:

From: <biefke@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 9:45 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Vincent Saulino
biefke@yahoo.com
2801 NW 93rd Street
Seattle, WA 98117

cc:

From: <michele.eva@nwair.org>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 11:29 AM
Subject: Amend the preferred alternative, Lake Whatcom DEIS

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Furthermore As this hillside is part of my home and my view and the place where my animal friends call home. It would be devastating to all those things if you took the trees. Please find another place for timber. This is our home! Thank you

Michele Eva Armstrong
Sudden Valley Resident

Sincerely,
Michele Eva Armstrong
michele.eva@nwair.org
192 Polo Park Drive
Bellingham, WA 98229

cc:

From: <sking360@aol.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 11:29 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for the opportunity to make comments on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I would like to strongly encourage the DNR to not build roads or log on the unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed and to monitor the impacts of logging to streams. Also, the management of this watershed should be conducted on sound science and monitoring, and include an inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Sandra King
sking360@aol.com
2500 Smaish Way
Bellingham, WA 98229

cc:

From: <bsvos@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 10:51 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Biefke Vos Saulino
bsvos@yahoo.com
2801 NW 93rd Street
Seattle, WA 98117

cc:

From: <dawnaiken@msn.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 9:47 AM
Subject: Comments to Lake Whatcom DEIS

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan. I am very concerned about the Lake Whatcom watershed, the drinking water of Bellingham, and the safety of people living under timer harvesting on unstable slopes.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed.

I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

It is essential that timber harvest and road building on unstable slopes be prohibited. It is essential that somebody monitor the impact of logging in this area. And it makes sense that the costs of monitoring, as well as the cost of investigation and studying impacts, should be included in the costs of timber harvesting. In other words, these committees should be paid through timber sale revenues.

Again, thank you for your consideration of this very important matter.

Sincerely,
Dawn Aiken
dawnaiken@msn.com
124 21st Ave. E.
Seattle, WA 98112

cc:

From: <timkadrmas@msn.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 9:47 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

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I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Tim Kadrmas
timkadrmas@msn.com
1206 Thomas Ln #1
Renton, Wa 98055

cc:

From: <eric@ehirst.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 9:47 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

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I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Eric Hirst
eric@ehirst.com
1932 Rhododendron Way
Bellingham, WA 98229

cc:

From: <randl.iverson@comcast.net>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 10:20 AM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Roger Iverson
randl.iverson@comcast.net
2900 Michigan St.
Bellingham, WA 98226

cc:

From: C & D Dagg <camdan1@shaw.ca>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 2:43 PM
Subject: Lookout Mountain re: SEPA file # 02-091300

Attention: Jenifer Gitchell
SEPA Center

I received the "Addendum to Draft Environmental Impact Statement File # 02-091300 but did not receive the original DEIS which was apparently mailed to me Sept.8, 2003. Therefore I did not understand, until hearing from a neighbour, what were the various alternatives of your draft.

Because many of us who have lived on Cain Lake for more than 20 years have been drawing our water from the lake, I naturally have some concerns about your plans for logging on Lookout Mountain. I would like to see Alternative # 3 incorporated into Alternative #2 as it would appear to lessen the impact to Cain Lake.

I also have some concerns regarding the proposed reforestation of the lands that were logged last spring and summer. We were assured this was going to take place early in the spring of 2003 and I would like to know when the new trees will be planted.

Yours truly,
Danae Dagg
3044 Camp 2 Rd.
Sedro Woolley
WA, 98284

October 6, 2003

Steve Saunders
SEPA Officer
Lake Whatcom Watershed Plan
Dept. of Natural Resources
Olympia, WA

Dear Mr. Saunders:

Thank you for the opportunity to comment on the Lake Whatcom Watershed Plan. I would like to say up front that given the alternatives we have to choose from I would like to choose the no-action plan.

Having said this, I would like to suggest that the Department start over and appoint a committee with some semblance of a scientific background. If you were to do this, we would end up with a scientific report that produces reasonable choices rather than a political document.

This document is the product of a political process that has excluded good science and has excluded well-trained resource professionals who know how to manage watersheds and potentially unstable lands. It is very disconcerting to know that none of the private timberland landowners with lands within the watershed were included on the committee. This committee was determining the management of not only public lands, but also private timberlands within the watershed.

A meeting with the timber industry and the affected private landowners was arranged last year at the industries insistence. At this meeting we were brought up to speed with where the process was, and where it was going, and we were assured that we would be kept in the loop from that day forward and that we would have more input before the SEPA document was published. That was the last time anyone from DNR tried to bring us as an industry group up to speed!

I am not against having members of the public as part of the committee, they have a right to be involved. Had the committee been more science and land management oriented, the product would have had much better choices than the alternatives we were left with.

Information coming back from at least one meeting held last week in Bellingham indicated that many people were interested in what professional foresters had to say about the plan, and wondered why we were left out of the process!

Sincerely,
Paul Kriegel
Stanwood, WA 98292

cc: Maureen Malahovsky for the Board of Natural Resources

From: "C WILKES" <cwilkes43@msn.com>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 8:17 PM
Subject: Re Lake Whatcom DEIS

I would like to register my opposition to the proposed logging plan for the Lake Whatcom watershed.

I live in Whatcom County and value the way of life that we enjoy in this area, and am writing to you to ask you to make several changes to your Preferred Alternative.

I ask that you provide the citizens of Whatcom County with your actual logging plan. At the workshop on the Lake Whatcom DEIS, it was stated by DNR staff that they intend to log significantly more the first two decades, that should have been included in the DEIS. Please correct this omission.

I am also very concerned about logging on potentially unstable slopes as recent studies have shown that this can lead to landslides. I live below one of those very steep slopes on Lookout Mtn. and do not wish to end up under tons of mud. I ask that you support the formation of an Interjurisdictional Committee to oversee all actions on DNR lands in the watershed, a committee that has the right to stop or modify activities. This committee should be funded not by local government, but by the revenues obtained from logging.

I also believe that there should be monitoring of all streams for sediment, as this contributes to a phosphorous problem in the lake, and even Basin 3 has dissolved oxygen problems.

I anticipate seeing these changes in the final draft of the landscape plan.

Sincerely,

Catherine Wilkes
452 Rainbow Dr.,
Sedro Woolley, Wa.98284

October 5, 2003

SEPA Center
P.O. Box 47015
Olympia, WA 98504-7015

Comments on SEPA File No. 02-091300

As a life long resident of Whatcom County, a Certified Forester and small forest landowner, I would like to submit the following comments on the Lake Whatcom Landscape Plan. My forest management experiences in Whatcom County, including the Lake Whatcom Watershed, leads me to the conclusion that appropriate management of DNR trust lands in the Lake Whatcom watershed should be similar to the “no action alternative”. This alternative has been developed over the years through numerous scientific studies and public involvement. It sufficiently assures public safety and protects the lake’s water supply, while providing the required trust revenues. I would concur with the Departments of Ecology and Health that forest management is the preferred land use to protect water quality. I strongly disagree with the planning committee’s preferred alternative and the other more restrictive proposal’s. These alternatives were politically driven agendas, with solutions spawned by individual efforts to prove “one person can make a difference”. One motivated person can make a difference, but the rest of us have to pay the price. Here are a few of my main points:

- This watershed with its second and third growth forest has been studied for years and present regulations provide more than adequate protection.
- The listed alternatives would be bad policy for DNR trust lands. What is finally done for Lake Whatcom sets precedence and will be pushed onto other trust lands.
- I am very concerned that more restrictions for public lands in Lake Whatcom will also be imposed as additional regulations for small forest landowners in the watershed. The impacts of this would be very counter productive.
- It is also very bad policy to have a plan with no flexibility or ability to apply adaptive management in the future, as new information is discovered. Having a plan that says 50% of the land can never be touched and aerial applications of herbicides and fertilizers can never be used, are not reasonable long term management objectives.
- The revenues that go to the trust recipients should not be reduced any further. The federal forest solution to just replace timber receipts with tax dollars should not be continued.
- Many other businesses in this area depend on the timber harvested on trust lands. These include sawmill employers, loggers, construction crews, reforestation workers and all the other related businesses.

Starting with the legislation and ending with the planning committee, this was a flawed process, with emotion, deception and politics leading the charge. I request that the Forest Board use good common sense and support the rules presently in place to protect the Lake Whatcom watershed.

Sincerely,

Tom Westergreen
4800 south Pass Road
Sumas, WA 98295

From: "Lori Hansen" <hansen518@earthlink.net>
To: <sepacenter@wadnr.gov>
Date: Mon, Oct 6, 2003 10:36 PM
Subject: Comments on the DEIS for the Lake Whatcom Landscape Plan (SEPA File No. 02-091-1300)

To the DNR

From Lori Hansen

419 Lakeside Drive

Sedro Woolley, WA 98284

Subject: DEIS for the Lake Whatcom Landscape Plan (SEPA File No. 02-091-1300)

I attended the meeting in Bellingham on September 22, and I have several comments about that meeting along with the "Preferred Plan" you are attempting to push through.

You did not notify the people in my neighborhood (Glenhaven) about the meeting on the 22nd. I spoke with at least fifty people, a great many who took the time and effort to write letters during your last public comment period. Only one other woman that I spoke with received your September 8 letter of notification for the meeting on the 22nd. The majority of the residents in Glenhaven are not aware of the current public-comment period. Why in the world did you not notify the people who would be the most directly impacted? At a minimum, notification should have been sent to everyone who provided contact information on the sign-in sheet of the last meeting. Certainly, everyone who submitted comments during the last public input period should have been notified of the current comment period. It would appear that you don't want to hear from citizens who might speak up against the plan you are "determined to push through".

The September 8th letter seemed designed to confuse the reader with a lot of legalistic and misleading jargon. In your letter, you stated "The alternatives presented and evaluated in this DEIS include", you then referred to the "No Action Plan", the "Preferred Alternative" and "Alternative 3". The No Action Alternative is not a legal option. It appears that the only purpose for referring to it is make Alternative 2, which you refer to as the "Preferred Alternative", falsely look as if it is the middle ground. It is NOT. Even the wording in describing Alternative 3, "to bracket the range of options", is designed to mislead. There were five Alternatives, and the first one was a "no go" from the start.

One of the most important points of the letter, to notify the public of the September 22nd meeting, seemed almost hidden at the very bottom. There was no explanation of what the meeting was for, and while Bloedel Donovan Park was mentioned, there was no address, directions or telephone number of who to call for information.

The actual meeting on the 22nd seemed orchestrated to push Alternative 2 on the public. It was constantly referred to as the "Preferred Alternative". Alternative 3 was always referred to as the "Non-Preferred Alternative". You made a point of using words like, balanced and compromised when referring to Alternative 2 throughout your presentation. It was only by questions raised from a few citizens that others became aware that there were originally five options presented; one of those was illegal. The truth is that Alternative 2 is on the lowest end of the spectrum, allowing the most logging that DNR can legally get away with. In no way does it represent a balance or compromise!

One of the men who spoke for the DNR must have slipped when he said, "We are determined to push through the Preferred Alternative". I heard those words! From the expressions of the people around me, they picked up on it too.

When asked what weight previous public comments had, we were vaguely told "a great deal". There is no evidence that public comments were taken into consideration at all. If our comments held any weight, then surely, Alternative 2 would not have been selected. I would like to see a summary of the previous comments. What percentage voted for Alternative 2, 3 and so forth. My guess is that the majority of public opinion was in favor of Alternative 4. It appears that the DNR, while giving lip service to the community, has completely ignored our input.

There is great concern for the safety of Glenhaven. We have submitted photographs of the extensive damage that resulted from two previous landslides. These landslides occurred before the recent logging. It only seems logical that if you log potentially unstable slopes, you create unstable slopes as a direct result. We were casually told at the meeting that there would always be risk, but that you believed that it was minimal. How minimal would you consider if it were your children at risk? The final plan must prohibit logging on all potentially unstable slopes. Human safety MUST take precedence over revenues.

There is no mechanism in place to pay for the damage that will eventually result from logging activities. How are people to be compensated for the lost of homes, cars, etc.? This is assuming that there is no lose of life. Is it really worth risking our homes? Surely, the potential for catastrophic property damage outweighs any revenue that could be generated.

Logging will affect several streams that flow directly into Reed Lake. Alternative 2 is insufficient to protect Reed and Cain lakes from the silt runoff that will result. Will DNR dredge Reed Lake? Many of the people who live on Cain Lake depend on the lake for their water supply. What pollutes Reed will flow into Cain Lake.

There are still many questions about the impact on the aquifer that feeds Glenhaven's community wells.

There is no remedy possible for the destruction of our water supply. We cannot afford take that risk!

There absolutely must be independent oversight! The inter-jurisdictional committee must have authority.

Do not try to weaken it!

In summary, Alternative 2 is insufficient. I much prefer to have the protections of Alternative 4. At a bare minimum, the protections of Alternative 3, along with the prohibition of any logging on potentially unstable slopes needs to be adopted in order to safeguard the people and property of Glenhaven. Logging can never generate enough revenue to justify one human life, or the destruction of our community.

Thank you for your time,

Lori Dawn Hansen

Paul Robert Hansen

Melissa Spring Hansen

From: "Linda Donley" <kmdonley@fidalgo.net>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 3:35 PM
Subject: Lake Whatcom Landscape Plan DEIS

I wish to thank you for the opportunity to comment on the management plan for DNR lands around Lake Whatcom.

I live in Whatcom county and my family and I drink the water from Lake Whatcom reservoir. For that reason I am writing to ask that you make several changes to your preferred alternative. These are:

1. Please provide the citizens of Whatcom County with your actual logging plan. You have stated (not in the DEIS) that you intend to log significantly more during the first two decades than the average you have stated in the DEIS. Perhaps this was an oversight, but should have been stated clearly in the DEIS. Please correct this.

2. I am concerned about logging unstable slopes and potentially unstable slopes. Because of these concerns I ask that you support the formation of an Interjurisdictional Committee that oversees all actions on DNR lands in the watershed, and has the ability and authority to stop and/or activities. This committee should not be funded out of the general fund of local governments, it should be paid for out of the revenues from logging harvest.

3. I believe there should be monitoring of all streams for sediment and temperature. Sediment contributes to a phosphorous problem in the lake and some areas even now suffer a dissolved oxygen problem.

4. Please respect the Lummi Nation's comments on the waters of Whatcom County.

Thank You again for the opportunity to comment.
Ken and Linda Donley
3032 Maple Place
Sedro-Woolley Wa. 98284

From: "George Kirkmire" <George@loggers.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 4:04 PM
Subject: Lake Whatcom DEIS

October 7, 2003

DNR SEPA Center
Lake Whatcom DEIS
P.O. Box 47015
Olympia, WA 98504-7015

To Whom It May Concern,

My name is George Kirkmire and I am executive assistant for the Washington Contract Loggers Association, a state-wide trade association representing the logging industry and affiliated industries. I would like to offer a few comments on behalf of our members in regards to the Lake Whatcom DEIS for the Lake Whatcom Landscape Plan.

First and foremost, regarding the Lake Whatcom Landscape Plan, is that DNR's preferred alternative was put together entirely utilizing input exclusively from the environmental community and specifically excluded timber industry and private landowners. This process has been one-sided and the preferred alternative reflects this bias. The other alternatives are unreasonable and fail to balance social, economic and environmental values which is a stated goal of the Board of Natural Resources.

The preferred alternative removes 49% of the Lake Whatcom landscape from active forest management. Doing this will require DNR to more intensively manage other trust lands to meet its trust mandate and fiduciary responsibility. The DEIS fails to analyze the probable significant environmental effects on other landscapes that would result from this proposed shift. Indeed, adopting this preferred alternative would open up the need for having an alternative EIS that evaluates a partial or total divesture of trust lands to assets outside the Lake Whatcom Watershed.

Active forest management is the answer and not the problem. Forest management and water quality are synonymous. The City of Victoria, on Vancouver Island, is a prime example of this as they have been harvesting timber in their watershed for decades without any damage to their water quality. Likewise, many of the smaller communities in Washington State follow employ the same principles while enjoying the multiple benefits.

There is no reason to believe that Lake Whatcom can't employ the same philosophy. The only stumbling block I can see is the inherent bias that a few influential folks and local environmental groups have towards the timber industry and forest management in particular. They need to get over it.

Thanks for accepting my comments.

George C. Kirkmire
Executive Assistant
WCLA
P.O. Box 2168
Olympia, WA 98507-2168

800.422.0074 ext 102

From: "Aubrey Stargell" <forestry@qwest.net>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 4:04 PM
Subject: file number 02-091300

I strongly support the no action alternative regarding the Lake Whatcom Landscape Plan for the following reasons.

- 1) The Lake Whatcom Watershed Analysis prescriptions already address the concerns expressed as justification for the preferred alternative and alternative 3. The operational prescriptions were developed by an multidisciplinary team of resource scientists to address a wide array of resource concerns (not simply laypeople with an ax to grind).
- 2) State lands in the Whatcom WAU are also covered by a Habitat Conservation Plan. This plan was reviewed and approved by US Fish and Wildlife and other regulatory agencies as being adequate for protection of the environment.
- 3). The WA Forest and Fish rule package adopted in March 2000 and all of the updates deal with issues of concern such as slope stability and water quality.
- 4). The landscape plan is supposed to confer with other large landowners in the watershed. Trillium Corp. and Nielsen Bros. Inc. were not formally consulted with.
- 5). The Lake Whatcom Landscape Committee is totally lacking of diversity. There was no forest industry representation on the committee whatsoever. The committee was handpicked to have like political and environmental views.
- 6). The adoption of any alternative other than the no action alternative would constitute an undue burden on the WA and Whatcom County taxpayers in terms of foregone timber revenues. Reducing the harvest after such comprehensive review and regulation already exists (WAU Rx's, HCP, Forest and Fish, etc.) to protect resources would be unnecessary and costly to WA and Whatcom County taxpayers.

In summary, I strongly support the no action alternative. Good water quality can be maintained along with responsible forest practices governed by current regulations and policies. Thank you for the opportunity to comment.

Aubrey Stargell
Maple Falls

From: Axel Schuessler <xuedu12@verizon.net>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 9:23 AM
Subject: Lake Whatcom Landscape Plan DEIS

RE: SEPA File No. 02-091300

Dear Sir,

As a resident of Glenhaven I have a number of serious concerns which I hope you will consider and address:

No road construction and cutting on unstable slopes. In the past decades, there have been landslides which did damage to parts of Glenhaven. Removing the forest cover can only increase the chances of mountainsides and risk to the community of about 500 houses.

No oil and gas exploration.

A transparent plan that clearly states how much will actually be cut every year.

An inter jurisdictional committee with independent scientists, which has the authority to stop risky activities.

Thank you very much for your consideration.

Axel Schuessler
513 East Alder Drive
Sedro Woolley, WA 98284

From: <danbellingham@worldnet.att.net>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:06 PM
Subject: Draft EIS comment for Lake Whatcom Landscape Plan

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

Dear Dept of Natural Resources:

I am writing to comment about the draft EIS for the Lake Whatcom Landscape Plan.

I have lived on Squalicum Lake Road (about two miles east of the lake) for 28 years. During that time I've seen a great deal of activity on the lake that obviously does not contribute to its status as our reservoir. (I noticed on a trip this weekend, by the way, that the City of Hoquiam has signs for miles and miles along the highway north of town reading "No Trespassing. City of Hoquiam watershed.")

I realize the state and the local governments get money from the sale of timber. I think what would be good is if the Plan provide for no road building or logging on unstable slopes. Oil or gas leases in the watershed would be a source of very significant potential pollution.

As population increases, the harm caused by poor logging and resource extraction practices affects more and more people. We can get money from more sources than we can get clean water.

Thank you for considering my comments.

Sincerely,

Daniel M. Warner

Sincerely,
Daniel M. Warner
danbellingham@worldnet.att.net
3854 Squalicum Lk. Rd.
Bellinham, WA 98226

cc:

From: <hdsolomon@comcast.net>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:08 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Harlan Solomon
hdsolomon@comcast.net
6509 Sierra Dr. SE
Lacey, WA 98503-2932

cc:

From: <cloudsv8@hotmail.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:08 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Paul Osebold
cloudsv8@hotmail.com
N. 15215 Cincinnati Dr.
Spokane, WA 99208

cc:

From: <starlita33@hotmail.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:08 PM
Subject: Lake Whatcom comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Water is absolutely the most essential part of any ecosystem and of any society, and the thought that our government here in Washington isn't doing everything in its power to protect it as much as possible from degradation is shocking. There is no justification (even money!) for blatant disregard of proven harmful practices, especially in the watershed for our drinking water! The money made will be spent instantaneously, but the effects will haunt Bellingham and its residents for generations to come. Please, look at the big picture - step up and defend our lake.

Sincerely,
Sara Thompson
starlita33@hotmail.com
817 Blueberry Ln. #104
Bellingham, WA 98229

cc:

From: <allusangels@msn.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:09 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
William R. Angel
allusangels@msn.com
656 Kirkview Place
Bellingham, WA 98226

cc:

From: <jodi@ecosystem.org>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:09 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The state legislature passed the Lake Whatcom bill in 2000 to protect drinking water and public safety in the Lake Whatcom watershed. The DNR's preferred alternative does not do enough to protect the watershed from future landslides, sediment loading and degradation of water quality in the future. I'm requested that the DNR change their preferred alternative for The Plan to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the watershed, to monitor the impacts of logging to smaller streams, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Jodi Broughton
jodi@ecosystem.org
1439 Iron St
Bellingham, WA 98225

cc:

From: <visioner@wildmail.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:10 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Jason Scullion
visioner@wildmail.com
36023 NE 80th
Carnation, WA 98014

cc:

From: <ceaaa2000@aol.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:11 PM
Subject: Lake Whatcom DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan. I have lived in Whatcom County for over 25 years. This is where I own a home raised a family and will watch that family continue to grow. Our water resource is not treated as such.

Most municipalities are able to secure the surrounding area of their water source to protect it from contamination. As our community continues to grow, our need for clean water will persist. It is far better to protect prior to contamination than to clean up afterward. If our zoning laws change to protect the water we will lose prime residential development in the form of lakeside and lakeview homes. This seems a small loss compared to the loss of clean water for all of our residents. I hope you will consider protecting our Lake Whatcom and prevent the further logging and development of the watershed.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Allain Van Laanen
ceaaa2000@aol.com
905 E Victor St
Bellingham, wa 98225

cc:

From: <dindamcp4@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:12 PM
Subject: Lake Whatcom DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change this to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir. It is also important for the water systems & the air we breathe, to preserve as much forest as possible. If asked, no one would exchange magazines, etc. for oxygen. Our planet is in a critical state and it is important we start conserving all of our resources.

Sincerely,
Dinda Evans
dindamcp4@yahoo.com
POB 178695
SAN DIEGO, CA 92177

cc:

From: <jvw2@juno.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:13 PM
Subject: Consider the impacts: Lake Whatcom DEIS

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

We live in Glenhaven, and our home sits almost at the base of the mountain. When the mountain comes down, we will be some of the first people to know. It is not fair to my children, nor anyone else that this impacts. I would ask that you consider how you would react if this were your home. Please consider how this impacts so many. Not only our safety, but water as well as to the environment. I am by no means a "environmentalist" but I think when thoroughly thought through, this is really a no-brainer.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
jay winn
jvw2@juno.com
634 east alder drive
sedro woolley, wa 98284

cc:

From: <grayum@nas.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:14 PM
Subject: Please reply: Lake Whatcom DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

I wish to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was intended to protect my community's drinking water and public safety in the Lake Whatcom watershed.

The mentality of continuing any logging whatsoever in the hills that provide the precious drainage to our drinking water reservoir is straight from the middle ages. Physicians in the middle ages "bled" people who were ill to try to heal them. Science scoffs at that now. Science and society will scoff at you if you continue to destroy the delicate balance of the ecology of our drinking water reservoir in the name of "public lands funding school buildings."

I insist that the DNR must change their "preferred" alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I request that you make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Please reply to me personally.

Sincerely,
Nancy Grayum
grayum@nas.com
1356 Sudden Valley
Bellingham, WA 98229

cc:

From: <mjohnson@az.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:14 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Mark Johnson
mjohnson@az.com
1795 Donald
Bellingham, WA 98226

cc:

From: <mam57m@aol.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:14 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Marie A. Marantette
mam57m@aol.com
299 Sudden Valley Drive
Bellingham, WA 98229, WA 98229

cc:

From: <damm559@aol.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:15 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Daniel E. Marantette
damm559@aol.com
299 Sudden Valley Drive
Bellingham, WA 98229, WA 98229

cc:

From: <barrh@cc.wvu.edu>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:15 PM
Subject: Lake Whatcom DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

I find it outrageous that the quality of the water that I drink can be compromised by allowing oil/gas exploration and logging in the Lake Whatcom watershed. It is essential that DNR maintains policies that promote the health of the Lake and the citizens that depend on it.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Hans Barr
barrh@cc.wvu.edu
4520 W. Laurel Dr. NE
Seattle, WA 98105

cc:

From: <jamiek@fidalgo.net>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:16 PM
Subject: Lake Whatcom DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

I would like to comment on the DEIS for the Lake Whatcom Landscape Plan.

The legislature has passed laws requiring you to protect Lake Whatcom as the source of our drinking water. So why does your "preferred alternative" include road building and logging on unstable slopes? We know the impact of slides into our drinking water. Why will oil and gas exploration in the Lake Whatcom watershed be permitted? This is our drinking water you're talking about.

I urge you change your plans to include monitoring of the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

The days of financing public schools from cutting down trees should be behind us. Surely we can do better for our schools and for the thousands of Whatcom County residents who drink from Lake Whatcom. I apologize for the cliché, but this is a no-brainer. PROTECT THE LAKE WHATCOM WATERSHED FROM IRRESPONSIBLE LOGGING AND GAS/OIL EXPLORATION.

Sincerely,
Jamie K. Donaldson
jamiek@fidalgo.net
218 Bayside Road
Bellingham, WA 98225

cc:

From: <pearljun16@aol.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:16 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Betsy Stalter
pearljun16@aol.com
505 N. Garden St.
Bellingham, WA 98225

cc:

SEPACENTER - SEPA file no. 02-091300

From: "Jan Callow" <callowjan@hotmail.com>
To: <sepacenter@wadnr.gov>
Date: 10/7/2003 10:21 AM
Subject: SEPA file no. 02-091300

To the Dept of Nat'l Resources,

It has been brought to my attn that a mtg was held Sept 22 to address concerns of logging practices in the Glenhaven area of Whatcom co. I live at 216 Alder Dr., on the west side of Cain's Lake. I did not receive any notification of this mtg.

I would like the dept to know I would be totally against logging in the area under your guidelines in Alternative 2.

I can support Alternative 3

Please count my voice

thank you

Jan Callow

MSN 8 helps ELIMINATE E-MAIL VIRUSES. Get 2 months FREE*.

From: <melissamcclure_8@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 5:16 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
melissa mcclure
melissamcclure_8@yahoo.com
1015 high st
bellingham, wa 98225

cc:

Draft Environmental Impact Statement
Lake Whatcom Landscape Plan
September 8, 2003
Washington State Department of Natural Resources

Dear Reviewers.

I have studied the whole DEIS and am familiar with the study area. I have been involved through this whole process and have tried to be active. I am vice-chair of the Lake Whatcom Forestry Advisory Forum. Also, Lake Whatcom is my primary source of drinking water.

I would like to say that this is one of the most incomplete and unscientific DEIS's I have reviewed. I will explain.

First I would like to point out that the law was not followed in many different ways:

1. The major forest landowners in the watershed were not consulted.
2. The forest industry was left out of the process altogether. They are one group that has the most to lose, and the most to give.
3. This document was not finished within the time line prescribed by law. Is it invalid then?
4. New information and new scientific information was not used or taken.

With the forest industry and forest landowners in the watershed being shut out of the process how can you come out with a product that is unbiased and meets the spirit of SEPA? Because of this the process should be started all over again with proper presentation of all groups, or the management of this area should continue under the regular forest practice rules and the states HCP.

It is very difficult to respond to the plan because the DEIS is not properly indexed so it is very difficult to pinpoint information that we must respond to. But I will try.

1. Page #1, 2nd to last paragraph, Not true the forest industry was left out
2. Page #3, 3rd Paragraph; The preferred alternative falls short of this. The No Action alternative is the only one that comes close to meeting this objective.
3. Page #12 No scientific support for wider buffers on type 4&5 waters and wetlands. Show the science.
4. Page #16 objective 11, why should this be pulled out of the over all state land sustained yield calculation. Treat all lands together.
5. Page #16, objective 13 look at Red Alder because of economics, biodiversity, and soil enhancement.
6. Page #54, Forest Habitats Quality and Quantity, last sentence, this is wrong. It is well known that more species are present in a varying age forest. That a well managed stand with many age groups will contain more species. If this stand was managed properly over the past years it would have the variety it needs for more species. This statement misleads to think an older stage stand has more diversity than any other age group or range of age groups. Fix this.

7. Page #76, Last paragraph first sentence "No probable significant impacts". Too vague not quantifiable.
8. Page #106 Paragraph 3&4 impacts need to be quantified too ambiguous.
9. Page #107, Paragraph 2 Water Surface and ground water quality the last sentence. PROVE IT; show the science that is behind this. Is it even measurable? If this statement can not be proven then it must be struck and the HCP rules be used.
10. Page #109, last paragraph. This is stupid what a waste of resources. Show the science that supports this kind of waste. HCP rules should be used.
11. Page #111 2nd paragraph, this is another waste of resource so what if we wipe out a few amphibians? They exist in the other buffers and they will soon come back into these areas no big deal. Not big enough to waste the timber resource.
12. Page #111, 3rd paragraph Red alder should be planted in areas that are highly recommended by the criteria set up by the hardwood cooperative that the DNR is participating in.
13. Page #111, 4th paragraph last sentence, This would be detrimental to the trusts the more seral stage timber for murrelets would mean more of the harvestable land would have to be used to buffer these area creating a bigger loss of land. The Murrelets need no more land they are doing well in their main habitat in British Columbia and Alaska.
14. Page #111, last paragraph, 3rd sentence, This is an assumption that is not substantiated by science and must be to be in this plan
15. Page #112, Fish section there is no science to back these assumptions of this alternative being more protective. Quantify these statements, if the impacts are the same as the no action alternative why do we need more protection?
16. Page #114, 4th paragraph the availability of Red Alder should increase. For biodiversity and economical reasons. You need to do more research on this.
17. Page #116, Risk of slides, floods, debris flows; these statements must be quantified so a judgment can be made to see if the extra protection is worth it.
18. Page #117, Recreation 2nd paragraph the loss of recreational opportunities is not acceptable.
19. Page #127, 6th paragraph, what is the impact? Good or bad? Quantify it.
20. Page #127, last paragraph, proves it, quantify it, and is it worth while? Are the impacts of more restrictive harvesting worth while? For the rest of the impacts the same thing. Is this overkill?

The social and economic impacts were almost nonexistent in this statement.

- 1, what are the social impacts of less harvesting?
 - a. jobs
 - b. divorce
 - c. domestic violence
 - d. alcohol drug abuse
 - e. suicide
 - f. recreation
 - g. loss revenue to social services
2. What are the economic impacts other than to the trust?
 - a. taxes

b. jobs

c. multiplier effect, The U.S. Forest Service Multiplier could be used.

3. What is the accumulative effect on the economy of the state of Washington and the timber industry? i.e.; the lost of timber land from federal, state, and private lands set aside for uses other than timber harvest.

It is law that the social and economic impacts must be studied and described in the DEIS.

A disturbing bit of information heard on 10-7-03. Someone on the landscape committee is telling people that the DNR is going to cut the whole 15000+ acres because they need the money. This statement was given to me by a resident in the Glenhaven neighborhood for an informational meeting to be held in their neighborhood (Sudden Valley, Glenhaven) by one or more of the committee members. If this is true how are these people going to respond to the DEIS in a rational matter. This should be looked into and we must understand how this impacts a study that is supposed to be impartial and unbiased. This whole study has gone bad and we should throw it out and let the board make a decision or start over. What a waste of money and resources.

In conclusion, I believe this DEIS does a poor job of convincing the public that any alternative other than the no action alternative or forest practice rules and HCP can be justifiably recommended.

Sincerely,

Richard Whitmore
Forester
4214 Van Horn Lane
Bellingham, WA. 98226

424 RAINBOW DRIVE, SEDRO-WOOLLEY WA 98284

October 7, 2003

SEPA Center
Department of Natural Resources
P.O. Box 47015
Olympia WA 98504-7015

Subject: Lake Whatcom Landscape Plan EIS
File No. 02-091300

Gentlemen:

I welcome this opportunity to comment on the Draft Environmental Impact Statement dated September 8, 2003. Word of this document reached me by word of mouth from several of our neighbors, despite the fact that we had attended DNR-sponsored meetings on logging Outlook Mountain in the summer of 2002, and had expressed interest in being kept informed of DNR actions affecting future logging in that area.

I live in Glenhaven, in Whatcom County, within sight of part of the area covered by the landscape (*aka* logging) plan described in the DEIS. Our home is also on the water downstream of Cedar Creek, one of the watercourses that have historically been affected by logging. Glenhaven residences have experienced noise, visual impacts, and damage caused by runoff from logging activities on Outlook Mountain. Water-related impacts have included water quality degradation in Reed and Cain Lakes, sedimentation in creeks and in the delta areas of creeks draining into the lakes, and damage from mudslides and landslides originating in areas disturbed by logging.

In the DEIS, the logging plan is characterized by annual parameters averaged over a 200-year period. Hidden away in the financial analysis are revenue figures showing that the long-term average parameters are not representative of DNR's plans for the immediate future. In fact, they show that the "preferred alternative" is to maximize cutting and revenue generation in the early years of the 200-year plan. The DEIS outlines only two alternative management plans, referred to as the "preferred alternative" and "Alternative 3". A "No Action Alternative" is also described. The latter is a misleading concept, since as I understand the legislation, if no action is taken by the BNR, the moratorium on cutting enacted in 2000 would remain in force. No analysis is presented of "Alternative 4", developed in the PDEIS phase of the landscape plan. The scientific advisors and the majority of members of the public who commented during the PDEIS phase favored this alternative.

DNR SEPA Center
October 7, 2003
Page 2

In my opinion, the DEIS is insufficient in the following respects:

1. It fails to describe the actual activities that will occur during the initial years of the plan in a manner that allows the reader or any analyst to predict probable impacts, and
2. It fails to describe a meaningful range of possible alternatives, limiting the choices to a mere two

Of the alternatives described in the EIS, I consider Alternative 3 to be preferable to the "preferred alternative", and to constitute a maximum tolerable level of harvesting. I would be more satisfied if "Alternative 4" were to be considered and adopted. The real "no action alternative", *i.e.* continuation of the moratorium, would also be acceptable, in my opinion.

Whichever plan is adopted, I have concerns regarding the monitoring of field activities to verify compliance with approved forestry practices and promised environmental safeguards. In this regard, avoiding disturbance of unstable and potentially unstable slopes is a major concern. Without a proactive approach to monitoring of field activities, experience has taught us that violation of appropriate constraints on logging operations is observed only after the event. In the Lake Whatcom watershed, it is especially important that violations be avoided, rather than recognized retroactively and maybe penalized nominally after the damage is done. In Glenhaven, we seek assurance that past damage caused by landslides triggered by logging, will not recur.

It is essential that an Interjurisdictional Team, including appropriate scientific and technical personnel, oversee field operations for the entire period during which the landscape plan is in force, and are given the power to shut down operations in the event of non-compliance with any provision of the plan. The entire cost of this oversight role should be funded from timber revenues, and none should have to be borne from the general funds of local government.

I look forward to seeing these comments reflected in revisions to the landscape plan in the final EIS.

Sincerely,

Lin Wilson

From: Halee Love <bhumi_devi@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Tue, Oct 7, 2003 10:23 PM
Subject: Lake Whatcom PDEIS

To whomever it concerns,

I am writing to express my concern over the proposed DEIS for the Lake Whatcom watershed. Really the land should be left for the people to enjoy, but if logging revenues are necessary and unavoidable great care should be taken to ensure that it is done a responsible manner. Meaning that there should be no deforestation around streams, in order to protect native fish that dwell there and any potential logging on unstable slopes should be carefully evaluated by an inter-jurisdictional committee. The preferred alternative of allowing natural gas exploration should be abandoned for it does not take into consideration the hazardous impact of logging unstable slopes or stream preservation. I urge you take whatever action necessary to insure the protection and proper use of public lands. Your cooperation is greatly appreciated.

Thank you for your time,

Halee and Bhumi Love
Lummi Island, WA

Do you Yahoo!?

The New Yahoo! Shopping - with improved product search
<http://shopping.yahoo.com>

Joan Casey
1015 West Toledo Street
Bellingham, W 98229
1-360-647-2346
email: jcasey108@earthlink.net

Mr. William Wallace
Region Manager, DNR
Northwest Region
Sedro-Woolley, Wa

October 6, 2003

RE: Comments on DEIS; Lake Whatcom Landscape Plan 9/8/03

Dear Mr. Wallace:

I attended the September 22 presentation of the Lake Whatcom DNR Landscape Plan DEIS public workshop and public hearing at Bloedel Donovan Park in Bellingham. Here are my comments:

1. Implement an independent PEER REVIEW of the Lake Whatcom Landscape Plan. During the public hearing for the PEIS there was a great citizen demand for an independent PEER REVIEW of the Lake Whatcom Landscape Plan. I heard no mention of this during the presentation in September. It is essential that this commonly used review process be implemented here so that we can be absolutely sure that no harm will be done by the logging practices implemented by this plan to the drinking water of over 90,000 people. The cost of the PEER REVIEW is to be borne by the DNR.
2. Post a bond based on the assurance that the water quality in the streams of the DNR lands will be cleaner. In the DNR presentation, quite an emphasis was put on "water quality". By the term, water quality, many of us mean the entire water body that is our Lake Whatcom Reservoir. DNR assures us that the water quality in the streams of their land will be cleaner. What bond can they post? What 100% assurance can they give that this will be so? There is no room for even the slightest margin of error, when the result would dramatically, negatively effect the quality of our drinking water.
3. Include in the EIS, information about other DNR logging sites within municipal watersheds. Director Bill Wallace stated he did not know if there were other DNR logging sites in municipal watersheds. Why not? This is of the greatest importance in distinguishing this watershed from other watersheds that are candidates for logging.

4. Implement a strong interjurisdictional committee with the authority to stop practices deemed too risky, as proposed by Mark Asmundson, the Mayor of Bellingham. This committee would provide continuous, informed technical oversight of the DNR lands in the Lake Whatcom Watershed. This committee would be able to make on-the-ground decisions regarding the logging practices in place. In the event that there is disagreement between the DNR and the interjurisdictional committee over specific site management activity, the disagreement should be mediated by an impartial third party before the DNR takes additional action. The expenses of this committee would be paid for by the DNR.
5. Include logging plans for the watershed in the DEIS. How can we evaluate the environmental impacts without a detailed plan of exactly what the DNR proposes to do. The citizens need to be informed of the actual management plan.
6. There should be no road building or improvements to existing roads on unstable slopes. The potential for slides is great and the uncertainty of a repetition of the slides of 1983 require a 100% guarantee that this potentially deadly occurrence does not happen again.
7. Limit logging to the summer dry months and prohibit it during the wet winter months. I can find no reference to seasonal logging constraints in the DEIS..
8. The Lake Whatcom Watershed is a complex and delicate system. The Nooksack diversion, which used to accommodate the needs of Georgia Pacific plant and flush the lake now runs far less because of that reduction in consumption, Native American Water rights and ESA water level requirements for the salmon in the Nooksack. This is especially true during the dry summer months when logging would be considered optimum seasonally. Any studies of the quality of the Lake Whatcom Reservoir must account for this reduced diversion, seasonal changes and slope stability.

I would appreciate your careful and thoughtful consideration and acceptance of these requests.

Sincerely,

Joan Casey

From: Tim Paxton <tim@synthesiscompany.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:44 AM
Subject: Lake Whatcom Landscape Plan DEIS Comments

Dear DNR

I am writing to question the goal of DNR and other State Agencies regarding the DEIS.

It is apparent from the email obtained from Dr. Jeff Koenig's WDFW Director's office that DNR Director Sutherland and Dr. Koenig have plans to "over see" the DEIS comments.

This plainly seems to most people that DNR and WDFW plan to IGNORE the DEIS comments where they conflict with existing Forest and Fish regulations.

In other words, DNR is planning on violating the intent of the EIS process by ignoring any and all comments as you see fit. Hence, this whole process is a waste of time and taxpayer money and appears to violate the intent of legislators who passed this bill as State Law.

Questions:

1. Why does DNR plan to "oversee" or ignore the DEIS comments?
2. Has DNR met with other State Agency Department Heads to plot and scheme to get them to go along with DNR's wishes and ignore public comment in the PDEIS and DEIS?

Sincerely,
Tim Paxton

Email message from WDFW Director Jeff Koenig's about his recent meeting with DNR Director Sutherland on their plans to apparently subvert the EIS process and ignore legislative intent.

----- Original Message -----

From Jeff Koenings
To everide@dfw.wa.gov
Sent Thursday, October 31, 2002 3:55 PM
Subject Lake Whatcom PDEIS

Bob,
Talked with folks at DNR ie, Doug and Jack and went through the DFW comments to a degree and DNR's reaction. To sum it up it was a Christmas Tree discussion. For example, it DFW supports Fish and Forest why question or demand things in excess of that statue. IF Ecology signs off on the water quality section of the PDEIS why does DFW think they have something to say about it. If the DNR HCP was agreed to by DFW why

question

provisions in the PDEIS that implement that HCP. In other words, live with the Christmas tree and don't try to add ornaments onto it.

There is a valid point here! That is why I stressed to Doug that we will have policy oversight going on over the DEIS comments that will be consistent with agreements already in place. I don't know if the tree or the ornaments as set forth by DNR are in the right categories--but the point was close enough to make some sense.

Jeff K.

Tim Paxton
2120 Ellis St.
Bellingham, WA 98225
Tel: 360-733-1733

From: Lisa McShane <lmcshane@ecosystem.org>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 12:14 PM
Subject: Lake Whatcom DEIS

Comments regarding SEPA file No. 02-091300 are attached. Please contact me if there is any problem with the attachments.

Thanks!
Lisa

10/6/03

Lisa McShane
Northwest Ecosystem Alliance
1208 Bay Street, Suite 201
Bellingham, WA 98225

Dear Lisa,

At your request I have reviewed portions of the Draft E.I.S. for the Lake Whatcom Landscape Plan that address slope stability. I have paid particular attention to evaluating differences in the way that the 3 alternatives would influence the potential for mass wasting.

In reading the Draft E.I.S. I considered implications for evaluating the potential for each of the Alternatives to meet the stated objective to “*ensure no significant risk ... from forest management related mass wasting events*”.

The Preferred Alternative continues to provide weak assurance of no significant risk, and provides assurance of no significant elevation of landslide risk from forest management. The alternatives provide substantial leeway for risk taking upon “*on-site evaluation by a DNR specialist*”. The degree to which this may prove effective at ensuring no significant risk depends not only upon the training and talent of the DNR specialist(s) but also on the institutional definition of acceptable risk that guides their interpretations and assessments. The assurance that risky actions such as “*harvest and road construction upon potentially unstable slopes*” shall be “*carefully regulated*” should provide little solace to a family living at the base of a potentially unstable slope. Although the draft E.I.S. indicates that under the Preferred Alternative the risk of landsliding associated with forest practices would be substantially mitigated by adhering to current forest practice rules, those rules were not designed to protect public safety, they were designed to accommodate timber harvest to the extent possible while mitigating potential adverse impacts on salmonids. Risk is the product of hazard (the chance of occurrence) and the impacts that result from such occurrences. Hence, one cannot help but conclude that the bar is higher for assessing no significant risk when public safety is at issue.

Precluding road construction and timber harvesting on “unstable” slopes in the Preferred Alternative removes the potential for patently risky actions, but it does nothing to address the fundamental problem of increased risk of landsliding resulting from harvest or road construction on potentially unstable slopes. And yet it is the latter problem that is generally of interest in terms of forecasting the effects of a management regime on public safety. Identifying the existing active landslides and restricting actions on them should not be difficult to do (at least not from a technical perspective). In contrast, the identification of future landslide sites among those considered to be potentially unstable is notoriously difficult, and so it is in the management of the potentially unstable slopes that the major differences in the alternatives play out. The Preferred Alternative allows harvesting and road construction on potentially unstable slopes upon consideration of

“inter-jurisdictional committee and specialists recommendations”. Such consideration provides no guarantee that decisions would in fact *“ensure no significant risk”*.

Alternative 3 provides for a 140’ buffer around the unstable ARS’s 1,2, 3 and 4, which encompasses ancient and dormant landslides, and incised stream channels and would preclude almost all roads on potentially unstable slopes. In addition, Alternative 3 would allow up to 50% harvesting on potentially unstable slopes. This prescription for potentially unstable slopes is experimental. I know of no studies that have demonstrated that a 50% partial cut on potentially unstable slopes (such as hollows, headwalls, and slopes steeper than 70% as they are defined in the Draft E.I.S.) would *“ensure no significant risk”* of landsliding from timber harvest. To the contrary, an analysis of the effect of root reinforcement on slope stability recently published in the Canadian Geotechnical Journal (Schmidt et al., 2001; a study which I was a co-author on), found that spatial variability in root strength—such as one might anticipate would result from a partial cut—was associated with those potentially unstable sites that generated rapidly moving, highly destructive debris flows in the Oregon Coast Range. In other words, the partial cut alternative for managing potentially unstable slopes is an experiment that carries with it an unknown element of risk, a risk that recent research suggests may not be minimal. Therefore, I cannot conclude that even Alternative 3 would meet the objective of not significantly elevating the risk of management-related landsliding.

Sincerely,

David R. Montgomery

Professor of Geomorphology and Licensed Geologist # 520 (State of Washington).

References Cited:

Schmidt, K. M., Roering, J. R., Stock, J. D., Dietrich, W. E., Montgomery, D. R., and Schaub, T., Root cohesion variability and shallow landslide susceptibility in the Oregon Coast Range, Canadian Geotechnical Journal, v. 38, p. 995-1024, 2001.

To: Dept. of Natural Resources
SEPA Center,
Lake Whatcom PDEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

Re: Lake Whatcom Landscape Plan DEIS, SEPA File No. 02-091300

On behalf of Northwest Ecosystem Alliance and our 8,000 members, 575 of whom live in Whatcom and Skagit Counties, I write to provide comments on the Department of Natural Resources' Lake Whatcom Landscape Plan Draft Environmental Impact Statement. Thank you for this opportunity.

I. Summary

A) Background

In 2000 the Washington State Legislature unanimously passed legislation, bill number E2SSB 6731, to protect drinking water and public safety in the Lake Whatcom watershed from the potentially catastrophic impacts of logging above neighborhoods and above a significant drinking water source. Today, after much public process, we have before us a preferred alternative in the DEIS that, with exceptions we will note in our comments, follows the prescriptions of the Lake Whatcom Bill in a fairly straightforward manner.

In addition to several opportunities for public input as E2SSB 6731 was before the legislature, there were opportunities for public input into the development of the Landscape Plan. In addition to the initial scoping meetings DNR held, there was a scoping meeting on September 12, 2001, October 10, 2002 and September 22, 2003. At each meeting, more than one hundred citizens attended and the vast majority of citizens and elected officials asked for either no logging, or for logging that carefully protects public resources. While we attended these meetings, and read the comments, we see little change to the preferred alternative as a result of detailed scientific information or an overwhelming preference for logging that poses little risk to the public and our most essential resources. In fact, Alternative 4, which had broad support from scientists, citizens and local government officials, did not receive further review.

The Lake Whatcom Landscape Plan is of the highest importance. It directs management activities on 15,700 acres of state trust lands in a sensitive and irreplaceable watershed. Lake Whatcom is the sole source of drinking water for more than 87,000 people. Half of Whatcom County relies on Lake Whatcom as the only viable source of clean, fresh drinking water. In addition, the neighborhood of Sudden Valley lies directly below Lookout Mountain, where "the terrain is steeper and more complex, with 30 to 40 percent slopes, truncated by deeply incised stream channels with walls generally inclined more than 50 %, often 70% or steeper."¹ Many of the homes would be in the path of potential debris flows or landslides from the DNR trust lands above.

¹ DEIS – Lake Whatcom Landscape Plan. Page 44.

Approximately 48% of the Lake Whatcom watershed is state trustlands, owned by the people of the state of Washington and managed on our behalf by the Department of Natural Resources. The DNR trust lands surround Basin 3 of Lake Whatcom and, as we will explain, changes in the total phosphorus levels in basin 3 have been documented and there are decreasing hypolimnetic oxygen concentrations. According to the DEIS, 35% of the inflow into Lake Whatcom is from trust lands. That is likely higher as the Nooksack diversion is rarely used. Given the importance of the trust lands to water quality in Lake Whatcom, and the documented increase in phosphorus levels even in Basin 3, it is likely that high levels of sediments originating on trust lands are negatively impacting water quality. Increased logging can be expected to exacerbate that.

B. Concerns

Today, the selection of a Landscape Plan is nearly complete, yet two primary questions remain: the role of the Interjurisdictional Committee and the role of science. Those questions must be answered, and should have been answered prior to the release of the DEIS, for any accurate evaluation of the landscape plan to be made by us, by elected officials, by scientists and by the public.

While the preferred alternative generally follows the details of the bill (with a few exceptions), it continues to fall short of the stated intent of the legislature to protect drinking water and public safety, it fails to follow the legislature's directive to incorporate new scientific information and fails to adequately demonstrate that it will keep sediment out of streams. In addition, and of great concern to us, the DEIS did not include the intended management plan for analysis.

C. Trust lands

Trust lands in the state of Washington are unique in the nation: "All the public lands granted to the state are held in trust for all the people."² Upon entering the union in 1889, the federal government granted the state sections 16 and 36 in every township "for the support of the common schools."³ Other land was given for other institutions, such as prisons and a state capital. The enabling act that made Washington a state contained rules for how the land grants could be sold and Article XVI of the Washington State constitution details how trust lands must be sold.

In 1984 the Washington Supreme Court ruled, in *Skamania v. Washington*, that the state Legislature could not let timber companies off the hook for logging contracts on state trust lands, because of the state's trust duty of "undivided loyalty." It said trust lands "are real, enforceable trusts that impose upon the State the same fiduciary duties applicable to private trustees...A trustee must act with undivided loyalty to the trust beneficiaries, to the exclusion of all other interests...The State may not sacrifice this goal to pursue other objectives, no matter how laudable those objectives may be."⁴ In this case the court narrowly ruled that the state cannot favor private industry above their duty to

² Washington State Constitution, 1889, Article XVI

³ Enabling Act, ch. 180, 25 Stat. 676 (1889).

⁴ County of Skamania v. State, 102 Wash. 2d 136, 685 P.2d at 579.

beneficiaries. It did not rule on the conflict between public values such as clean drinking water, recreation or wildlife and the beneficiaries.

While some infer the Skamania ruling means the state must maximize revenue, in a more recent case in Okanagon County, the Chelan County Superior Court said “nothing in the law... requires the department to maximize current income.”

The state Supreme Court has also written that the public trust doctrine is like “a covenant running with the land...for the benefit of the public and the land’s dependent wildlife.”⁵ It is this broad public trust that must be protected: the state’s enduring obligation to provide clean drinking water and public safety.

The lands covered by the DEIS have a broad public trust benefit: they provide clean drinking water to half of Whatcom County residents. They also pose a significant threat: thousands of families live in the homes below the steep slopes and in the past, DNR logging triggered catastrophic debris flow events and landslides that put houses, cars, a person, and some 65 cubic acres of timber debris into Lake Whatcom. The repeated requests of legislators, local elected officials and countless citizens are reasonable: they want DNR logging to cause no harm to drinking water and neighborhoods. It is their explicit expectation that, as these lands are held in trust for all the people, and managed by the DNR on our behalf, that activities on these lands shall not harm them but shall provide a public benefit. These expectations are consistent with the state Constitution and Enabling Act and with subsequent laws and court decisions.⁶

Those expectations of a broad public benefit are heightened by the fact that 60% of the Lake Whatcom trust lands are held in trust for Whatcom County. The beneficiaries are largely local and the clear and stated intention of the statutes that originally created this body of trust land was reforestation, not generation of revenue.⁷

Thus, these are trust lands that must be managed “for all the people,”⁸ with the objectives of producing clean drinking water, providing for public safety through the attenuation of landslides, and producing some revenues for the beneficiaries. That broad public trust has not been met; the DEIS does not sufficiently protect drinking water or public safety.

II. The DEIS fails to follow legislative direction in E2SSB 6731

A) We must express our extreme disappointment that the DEIS fails to include the full and correct language of bill number E2SSB 6731 in the DEIS. E2SSB 6731 states: “The department shall consult with the Lake Whatcom management committee on proposed timber harvest and road management activities. The department shall establish an

⁵ Orion Corporation v. State, 109 Wash. 2d 621, 639, 747 P.2d 1062, 1072 (1987)

⁶ Chasen, Daniel Jack, 2000. A Trust For All the People: Rethinking the Management of Washington’s State Forests. Seattle University Law Review. Vol 24, No 1.

⁷ Chasen, Daniel Jack, 2000. A Trust For All the People: Rethinking the Management of Washington’s State Forests. Seattle University Law Review. Vol 24, No 1.

⁸ Washington State Constitution, Article XVI.

interjurisdictional committee for the development of the landscape plan, to review the site-specific activities and make recommendations.” However, that language is missing from the bill language included in the DEIS. I reviewed all past versions of the bill on the legislative website and no previous version matches the one in the DEIS.

The version in the DEIS states: “The department shall consult with the Lake Whatcom management committee for the development of the landscape plan, to review the site-specific activities and make recommendations.” 15 key words are missing and their removal changes the meaning of the bill and the intent of the legislature in the very area that remains controversial. The Lake Whatcom Management Committee consists of the Mayor of Bellingham, the County Executive and the Manager of Water District 10. While the Legislature stated their intent for DNR to consult with that committee, and other groups, they clearly outlined an important role for the Interjurisdictional Committee, a Committee originally established by SSSB 5536 in 1999. The fact that the removal of those key words from the bill happens to support the department’s preference for how to manage public oversight of Lake Whatcom management plan gives the appearance that the omission could have been a deliberate effort to create an outcome the department considers favorable by ignoring the clear written language of the law. The department needs to investigate and determine how a mistake of this magnitude happened and report the results of that investigation to the public. But regardless of how this mistake happened, deleting language from the bill is a serious error and reflects poorly on the DNR.

In addition, it was our expectation that, once this error was pointed out, errors would be corrected with due haste. While a new appendix with the accurate bill was eventually produced, a DNR staff member stated at the DEIS public hearing that it was only a difference of 6 words (it’s 15 words and not a minor error.) Even today, if a citizen downloads a copy of the DEIS from the DNR website, they will be downloading an inaccurate version of E2SSB 6731. It is the responsibility of DNR to ensure that material known to be inaccurate is not disseminated on the DNR website.

- **We ask that you reprint the DEIS, replace all copies in circulation, and remove the inaccurate bill from your website.**

B) Because the DEIS includes inaccurate information (and the *Responses to Public Comments Received Regarding the PDEIS*, dated March 7, 2003) it seems clear that the drafters of the DEIS were writing this document with an incomplete understanding of the law that DNR is required to follow. The inaccurate version of the bill states only that the Interjurisdictional Committee “may recommend to the department restrictions upon timber harvest and yarding activities on a case-by-case basis.” However, the Interjurisdictional Committee has a broader and more important role to play: **they are to review all site specific activities and make recommendations.** The following changes to the DEIS language will be required in order to comply with the law as written: the Inter-Jurisdictional Committee (IJC) will review all site specific activities and make recommendations, including road construction, road maintenance and abandonment, all proposed timber harvests, including proposed activities on potentially unstable slopes to

determine actual unstable areas, any proposed application of herbicides, pesticides or fertilizer and any management of nesting, roosting and foraging sites.

- **You must make those changes so that the Lake Whatcom Landscape Plan follows E2SSB 6731.**

C) The bill states that “On unstable slopes, new road construction shall be prohibited.” The DEIS states that DNR will “follow Watershed Analysis prescription for road construction in ARS #1.” ARS #1 is defined in the DEIS as unstable.

- **You must prohibit road construction on all unstable slopes, including ARS #1 for the Lake Whatcom Landscape Plan to be consistent with E2SSB 6731.**

D) Potentially unstable slopes: the IJC shall oversee all site-specific activities, including any road building on potentially unstable slopes. In addition, all determinations of stability and harvest shall be made with the IJC.

E) Road building: the IJC must be involved with all activities, yet no involvement with the road plan is stated. The PDEIS states that logging roads were largely responsible for past landslides in this watershed, and so families below these forested slopes need to know that roads, and the building and abandonment of those roads, receive the highest level of scrutiny by independent geologists with expertise in this area.

III. The Interjurisdictional Committee

The Interjurisdictional Committee (IJC) was established by legislative directive to oversee all activities on a site specific basis, including road building plans, and to make recommendations. For citizens to have confidence in the Preferred Alternative, there must be a committee that is knowledgeable, in fact expert, and consistent over time in order to make substantive recommendations on details of slope stability, water quality and forestry.

The best approach for an ongoing interjurisdictional committee is to have Whatcom County, the City of Bellingham and the Tribes work together to appoint a committee that will follow the legislative directive for the IJC and the legislative intent to protect public safety and clean drinking water. That committee should be a small group, with a long-term participation commitment, that retains 2 or more scientists on contract to make recommendations to DNR on all activities. Those recommendations must be more than just opinions to be listened to and possibly ignored. There must be a mediation process for potential disagreement in place prior to the formation of the committee. There must also be a funding source to reimburse citizen members of the committee per diem for time spent on committee business, and for the City and County to be reimbursed for contract expenses for any scientists they retain. As timber harvest on trust lands generates revenue, it is reasonable and fair to expect that any costs should be reimbursed from the management account for those lands.

IV. Incorporate New Scientific Information When Available

E2SSB 6731 calls for the landscape plan to “incorporate...**new scientific information when available**,” (emphasis added.) This is a high standard set by the legislature and they and citizens expect that this will be followed. Much of the new scientific information presented by NWEA, scientists and citizens during public comment periods conflicts with established DNR practices, and demonstrates that the bar should be raised even beyond E2SSB 6731 in order to follow the Lake Whatcom Landscape Planning Committee objectives and the legislative intent as detailed below. To date, you have not incorporated that new scientific information in the landscape plan.

In our comments to the PDEIS we provided new scientific information in areas such as slope stability, yet that peer reviewed science was not incorporated into the Preferred Alternative in the DEIS. Since it was not addressed, we incorporate our previous comments to the PDEIS by reference into this document, including comments provided to us by Dave Montgomery on October 10, 2002.

Geologist Dave Montgomery provided the following comments for the PDEIS: “Precluding road construction and timber harvesting on “unstable” slopes in Alternative 2 removes the potential for patently risky actions, but it does nothing to address the fundamental problem of increased risk of landsliding resulting from harvest or road construction on potentially unstable slopes. And yet it is the latter problem that is generally of interest in terms of forecasting the effects of a management regime on public safety. Identifying the existing active landslides and restricting actions on them should not be difficult to do (at least from a technical perspective). In contrast, the identification of future landslide sites among those considered to be potentially unstable is notoriously difficult (if not impossible), and so it is in the management of the potentially unstable slopes that the major differences in the alternatives play out. Alternative 2 allows harvesting and road construction on potentially unstable slopes upon consideration of “*inter-jurisdictional committee and specialists’ recommendations*.” Such consideration provides no guarantee that decisions would in fact “*ensure no significant risk*.” Additionally, Montgomery pointed out that even Alternative 3, with partial cuts on potentially unstable slopes is risky. He stated “I know of no studies that have demonstrated that a 50% partial cut on potentially unstable slopes (such as hollows, headwalls, and slopes steeper than 70% as they are defined in the Draft EIS) would “ensure no significant risk” of landsliding from timber harvest. To the contrary, an analysis of the effect of root reinforcement on slope stability recently published in the Canadian Geotechnical Journal (Schmidt et al., 2001; a study which I was a co-author on), found that spatial variability in root strength – such as one might anticipate would result from a partial cut – was associated with those potentially unstable sites that generated rapidly moving, highly destructive debris flows in the Oregon Coast Range.” Yet you moved Alternative 3 forward for further review without addressing the substantive scientific issues raised by that study. We question whether that study was considered as directed by E2SSB 6731.

- **We ask you to incorporate the new scientific information Dr. Montgomery provided to you in 2002 and move Alternative 4 forward for further review, rather than Alternative 3.**

E2SSB 6731 holds DNR to a high standard, to incorporate new scientific information when available. There is ample available evidence to demonstrate that timber harvest and road construction on potentially unstable slopes is not a low risk endeavor. You state erroneously that it is. We asked Dr. Montgomery to review the PDEIS on our behalf and he clearly stated, and backed it up with scientific references, that logging on potentially unstable slopes is risky. The DEIS says that it's not. The DEIS conclusion is not supported by the best available science.

- **We ask you to provide the studies that demonstrate that logging and road building on potentially unstable slopes meets the stated standard of ensuring “no significant risk.” If you cannot provide substantial scientific studies that ensure that this logging ensures “no significant risk” then you need to change the preferred alternative to ensure no significant risk by prohibiting logging and road building on potentially unstable slopes.**

In addition, a recent, published study indicates that root cohesion in industrial forests, such as comprise many of the DNR lands in the Lake Whatcom watershed, more closely resemble the root cohesion of 10-year old clearcuts than natural forests (K.M. Schmidt, J.J. Roering, J.D. Stock, W.E. Dietrich, D.R. Montgomery, and T. Schaub. 2001. The variability of root cohesion as an influence on shallow landslide susceptibility in the Oregon Coast Range. Canadian J. Geotech./Rev. Can. Geotech. Vol. 38 no.5, pp.995-1024. This indicates that the past may not predict the future of slope stability: slopes previously determined to be stable or potentially unstable based on past disturbances may lack the root cohesion necessary to stabilize slopes in the near future. And industrial logging, as has occurred on DNR lands in the Lake Whatcom watershed, may have altered the stability of the slopes.

- **We ask that you incorporate this new scientific information into your preferred alternative.**

Monitoring

We find no reference to ongoing monitoring in the preferred alternative. In fact, no alternative addresses the clear need to conduct ongoing monitoring to ensure that DNR will “maintain and restore the sediment regime within the range of natural variability.”⁹ Without monitoring there is no way of knowing whether the objective is being met, particularly since the objective, to restore the sediment regime, is such a high standard, agreed upon by both the DNR and the Lake Whatcom Landscape Committee.

- **We ask that monitoring and a process for adaptive management be included as part of the preferred alternative.**

DOE and DOH letters

During scoping the Commissioner of Public Lands asked the Department of Ecology and the Department of Health: “What additional water quality protection measures, if any, should the Department of Natural Resources consider beyond those already set forth in the Forest Practices Rules and the Lake Whatcom Watershed Analysis; the Department of Natural Resources’ Forest Resource Plan and HCP for state trust lands, and the additional

⁹ DEIS Preferred Alternative, Objective 2, page 11.

requirements set forth in E2SSB 6731?¹⁰” The Department of Ecology and the Department of Health each responded with a letter. These two letters continue to be used by DNR staff, and in the DEIS, as substitutes for analysis and scrutiny by the Department of Natural Resources. In the PDEIS the department stated: “Alternative 1 is unlikely to adversely affect the public water supply. (See letters from the departments of Ecology and Health, Appendix D, PDEIS7 and PDEIS8.)¹¹” While we’re relieved that the department no longer holds them up as proof that Alternative 1 is fine, given that the letters have always discussed the preferred alternative, they remain merely letters. These letters are then, in part, ignored by the department. The letter from the DOH states: “The Department participated in DNR’s 1999 Lake Whatcom Interagency Advisory Committee. That advisory committee developed water quality protection recommendations that targeted prevention or reduction of future sediment loads reaching Lake Whatcom from DNR’s activities in the watershed. DNR should consider implementing the recommendations of that committee. As noted, the Department is currently participating in DNR’s Lake Whatcom Landscape Plan advisory committee. Site-specific recommendations identified by that process related to enhancing water quality should also be considered.” Let me be clear: the letters from the DOE and DOH should not be used by an agency with scientists on staff, as scientific proof. The community has higher expectations of their Department of Natural Resources. The legislature asked you to incorporate new science, not letters of opinion.

In our comments to the PDEIS we suggested that if you are to use those letters that you follow all of the recommendations of the letter from the DOH. You did not respond. Instead, you continue to cherry pick the parts of the letters you like, rather than following DOH’s reasonable recommendations to implement the 1999 committee’s recommendations.

- **We ask again that you follow the recommendations of the Department of Health and implement the recommendations that emerged from the 1999 Lake Whatcom advisory committee.**

The DEIS states that “total phosphorus concentrations have consistently been lower in Basin 3 than in the more urban influenced Basins 1 and 2.”¹² Yet that doesn’t tell the full story. The 1998/99 Lake Whatcom Final Report states: “Dissolved oxygen appeared to be decreasing over time at Sites 1, 3 and 4...Most of the correlations at Site 3 occurred in deep water (>50m) from July through December (approximate time of destratification in basin 3). Therefore, these correlations were most likely the result of decreased levels of oxygen in the hypolimnion. (We noted earlier that hypolimnetic oxygen concentrations were unusually low at Site 3 during 1998 and 1999.) The correlations at Site 4 occurred primarily during April, June, October, November, and December, and were scattered throughout the water column rather than being confined to the hypolimnion...The absence of any similar pattern in the temperature vs. year indicates that the oxygen results

¹⁰ Letter from Commissioner Sutherland to DOE and DOH, dated November 8, 2001, printed in the Responses to Public Comments Received Regarding the PDEIS. March 7, 2003.

¹¹ Lake Whatcom Landscape Plan PDEIS, Executive Summary.

¹² DEIS – Lake Whatcom Landscape Plan, page 50.

are not likely caused by temperature differences from year to year.¹³ “There is, however, a very clear change in the total phosphorus levels in basin 3 (see 2001/2002 Report Figures 119-120, pages 184-185.)¹⁴” The FEIS needs to reflect the likelihood that sediment yields from DNR land are negatively impacting oxygen levels in the lake. The DEIS lists impacts to surface water quality as sediment, water temperature, and nutrients, then states “However, management of trust lands is not a significant contributor to these problems.¹⁵” This is simply not true: large quantities of sediment enter the stream systems and flow to Lake Whatcom from trust lands – 2.4 times the normal background level over 15,700 acres, according to DNR’s PDEIS.

- **We ask that you evaluate the amount and sources of sediment entering the lake from the trust lands and contributing to phosphorous loading and deoxygenation and adapt the preferred alternative in order to minimize additional sediment inputs**

V. Evaluation of the preferred alternative

In several places the preferred alternative falls short of the prescriptions outlined in E2SSB 6731 and in key areas the preferred alternative falls far short of the objectives laid out by the committee. When DNR and the committee agreed upon objectives that the preferred alternative would eventually meet, it seemed fair to assume that effort would be made to ensure that the preferred alternative met those objectives.

RMZs: We are pleased to see that type 5 streams receive some protection. Not only are these the very headwaters of our streams, but these are often areas of unstable soil. However, we are concerned to read that you intend to build roads and yard across these areas.

- **We ask that any proposed roads crossing type 5 streams occur with the agreement of the IJC, following review by independent geologists, and that only full-suspension cable yarding across type 5 streams be considered by the IJC.**

Potentially unstable slopes: In the Lake Whatcom Landscape Plan potentially unstable slopes are described as: “areas that were not included in the previously mapped ARSs, have not been subjected to slope movement processes, and indicate a potential for future slope movement. These include slopes inclined steeper than 70 percent, incised stream channels, convergent (concave) headwall areas, slopes at the outside edges of stream meanders, and slopes greater than 65 percent at the toes and scarps of deep-seated landslides.¹⁶” We have already stated the opinion of geologist Dave Montgomery that logging on potentially unstable slopes is risky.

- **We ask that you do not log potentially unstable slopes.**

¹³ 1998/99 Lake Whatcom Report. Page 12.

¹⁴ Email Communication from Robin Matthews to Lisa McShane 10/6/03.

¹⁵ DEIS – Lake Whatcom Landscape Plan, page 49.

¹⁶ DEIS – Lake Whatcom Landscape Plan, page 46.

Hydrologic maturity: Objective 4 states: “Maintain the forest hydraulic (sic) regime for each sub-basin within the range of natural variability.”¹⁷ (I assume you mean to say hydrologic regime.) However, the DEIS doesn’t state what the forest hydrologic regime is within each sub-basin. How can DNR achieve an objective if it isn’t clearly stated?

- **We ask that the FEIS evaluate the forest hydrologic regime for each sub-basin, detailing the natural variability.**

Your criterion is not necessarily protective of water quality. The HM threshold is defined as one that does not increase a two year peak flow by more than 10 percent. Yet you don’t examine what happens with ordinary rainfall events that will increase peak flow, possibly to at or above the normal two year peak flow if stripped of forest cover. When stripped of forest cover, sediment will be rapidly transported through the stream system into the lake. Since each stream system erodes differently, that needs to be evaluated separately for each stream. A recent scientific study by Derek Booth evaluated the impacts of impervious surface and forested cover in a watershed: “The most commonly chosen thresholds, maximum 10 percent EIA and minimum 65 percent forest cover, mark an observed transition in the downstream channels from minimally to severely degraded stream conditions.”¹⁸

On page 33 of the DEIS hydrologic maturity is estimated at 90% of the forested land. If the forests were at 100% hydrologic maturity at this time, and are harvested at the rate anticipated, 75 acres of clearcuts for 20 years, then 97 acres of clearcuts for the next 20 years, you would reach 88% hydrologic maturity (not taking into account the undefined thinnings intended.) However, at this time there are existing clearcuts on Lookout Mountain that must be taken into account. So, not only does the 90% HM seem unlikely and illogical, it’s inconsistent with your estimates for the sub-basins.

- **We ask that you estimate hydrologic maturity over the next 40 years, taking into account the current state of DNR forests.**

On page 50 of the DEIS, Table 8 shows the hydrologic maturity thresholds for Hydrologic Analysis Units within the Lake Whatcom watershed. This is a confusing way to present the information and doesn’t seem to tell the full story. It doesn’t give the total acreage per hydrologic analysis unit. It can be assumed that no basins are 100% hydrologically mature today, so the current acres of effective hydrologic maturity aren’t 100% of the sub-basins. Given that, it appears DNR is shooting for hydrologic maturity of from 23% to 54%, depending on the sub-basin. That’s remarkably low and will lead to more frequent peak flow events and increased sediment run-off which defeats the objective of restoring the sediment regime.

Risk analysis: In the March response to citizen comments, DNR said on Page 88 that it may use a risk assessment matrix in the DEIS. Such an evaluation would be quite useful yet I don’t find it in the DEIS. In our PDEIS comments we stated: “We ask that, as part of the DEIS, the DNR conduct a risk assessment for potential landslides in the watershed

¹⁷ DEIS – Lake Whatcom Landscape Plan, page 12.

¹⁸ D. B. Booth, D. Hartley, R. Jackson. 2002. Forest Cover, Impervious-Surface Area, and the Mitigation of Stormwater Impacts. *Journal of the American Water Resources Association*, v. 38:835-845.

based on potential costs of lake cleanup, loss of homes, loss of infrastructure and loss of life.”

We also pointed out that in 1996, in Rock Creek, Oregon, logging on steep slopes above homes triggered a landslide that crushed a home. Four people were killed, leaving 2 children orphaned and 2 children without a mother. In the civil suit that followed, Marvin v. Champion International, citizens sought \$11.3 million. Champion settled out of court for an undisclosed amount of money.

Following the 1983 landslides in the Lake Whatcom watershed, DNR was found to be at fault and the court required DNR to pay \$5 million to the City of Bellingham to reimburse costs from the landslide. It’s estimated that the total costs exceeded \$8 million. It’s entirely possible that the cost of logging potentially unstable slopes in the Lake Whatcom watershed can far exceed the benefits of the entire logging operation in the watershed with only one more incident like the 1983 landslide.

There is significant liability in logging potentially unstable slopes above neighborhoods and above a drinking water reservoir. DNR has been reminded time and again of this liability and of the grave risks by hundreds of citizens and elected officials. Yet the preferred alternative remains risky: logging and road building on potentially unstable slopes is anticipated, as are 43 miles of new roads, despite a recent study shows that the heritage of industrial logging is a forest with the root cohesion of a 10-year old clearcut. DNR revenues are calculated out over a 200 year period, and so should the risks be estimated.

- **We ask that a risk assessment matrix be included in the FEIS in order to fully inform the public and decision makers of the potential costs and potential benefits.**

Cumulative Impacts: While I understand the perspective in the DEIS that previous law represents a non-action, it sets up an unusual assessment in the DEIS where cumulative effects are analyzed only in the context of a scenario where it could have been worse. Certainly, activities restricted by E2SSB 6731 are better for water quality than those allowed under Forests and Fish and the HCP. However, that doesn’t really assess the cumulative impact that logging ¼ of a watershed can have in a drinking water reservoir and really only addresses the impact the preferred alternative has to current forest practice rules. For example, the DEIS on page 33 states “The risk of sediment and phosphorous loading above natural background levels into Lake Whatcom is less under the Preferred Alternative than under the No Action Alternative.” This is not informative. Nowhere does the DEIS state what the sediment and phosphorous loading is under either the preferred alternative or the no action alternative, giving no basis for the conclusion and providing no means of determining significance.

- **We ask that an analysis of the cumulative effects be provided in the FEIS, including an analysis of: what percent of the total watershed will be stripped of forest cover in 20 years; what effect will that have on water quality; and what will be the impact of 43 miles of new roads?**

- **We ask that the cumulative environmental impacts of the preferred alternative, particularly the impact of 43 miles of new roads to water quality and the increased risk of landslides be addressed in the FEIS.**

Cultural Resources: We wish to thank the DNR for working closely with the Lummi Nation and crafting a plan intended to protect cultural resources. It's my understanding that DNR intends to use this plan as a model for other state trust lands. That's commendable.

In reviewing the Lummi Nation's comments to the PDEIS (Lake Whatcom PDEIS Comments and Responses, Appendix C), there appear to be several concerns that have not been addressed: "increased delivery of sediment to streams will impact our ceremonial sites;" "roads and landing locations would have adverse impacts to cultural resources;" "RMZ along our ceremonial areas doesn't protect our concerns." I hope that these good points will be addressed through changes to the preferred alternative in the FEIS. In many cultural traditions water is sacred. The water that flows from a logged area is impaired relative to water flowing from a mature forest. The concerns of the Lummi nation that sediment in streams will impact their ceremonial sites should not be taken lightly.

- **We ask that the preferred alternative be modified to stop the additional delivery of sediment to streams in order to have minimal impact on their ceremonial sites.**

Revenues: There are a number of irregularities and problems with the analysis of the revenues.

A) First, the revenues outlined in the PDEIS do not match up with the revenues in the DEIS, when adjusted for annual revenue based on either a 4% or 5% discount rate. Yet the overall acreage of timber harvested is identical. This creates distrust with local citizens and local governments when the same trees and the same logging plan produce such varied estimates of financial benefits. Please explain that difference.

B) On page 17 the DEIS lists strategies for generating revenue, however, reconveyance is not a revenue generating mechanism and should not be included in the DEIS.

C) The DEIS lists conservation easement in its itemization of revenues, but it doesn't receive further explanation and it's not clear how that would generate revenue.

D) In the appendix the DEIS approaches revenue production from the question of how to make up a perceived loss of income from what could have happened before E2SSB 6731 and evaluate the decision of the preferred alternative over the no-action alternative based on that difference. However, in 2000 the legislature made the decision already: DNR is to provide for clean drinking water and public safety without compensation for the lost revenues. It would seem to be more realistic to approach potential additional revenues from the perspective of existing law. For example, the Lake Whatcom bill is a significant step forward in protection of public resources and should be at or close to the mark for FSC certification. DNR has found that certified wood sells for an additional \$21/mbf. At

an average annual yield of 2,730/mbf, DNR would realize an additional \$57,330 per year. That seems worth further investigation.

E) What is not worth further investigation is a destination resort development. DNR land is zoned commercial forestry. Such zoning does not allow for a resort. I think it's unlikely that an upzone that brings more development and traffic into a drinking water reservoir will be tolerated by local citizens or elected officials.

F) While the net present value of timber (Table DEIS4-1) is consistent with the PDEIS it seems to not be internally consistent. The preferred alternative represents 50% less timber production (DEIS Table 6, p. 42) than the no-action alternative yet logging revenues drop by just 35%. We'd appreciate an explanation of that difference.

VI. SEPA Concerns

The Draft Environmental Impact Statement is a document that evaluates the impact to the environment of alternative actions. Yet, the DEIS is not evaluating the timber plan. DNR distributed a different harvest plan to the Committee, dated March 2003. While the DEIS evaluates the impacts of 43 acres of clearcuts per year and 35 acres of thinnings, DNR's actual intended actions are not those. From 2001 to 2020 DNR intends to clearcut 75 acres and thin 11 acres per year. From 2021 to 2040 DNR intends to clearcut 97 acres per year and thin 24 acres per year¹⁹. These are not small differences. In fact, for the second two decades DNR intends to double the acreage clearcut per year! Environmental impacts do not average out. The DEIS should have stated and then evaluated the impacts of the intended actions. To include only a 200 year average is mis-leading and avoids the intent of the DEIS – to evaluate the environmental impacts.

- **We ask that the impacts of DNR's actual timber harvest plan be disclosed and evaluated in the FEIS.**

VII. Conclusion

We thank you for this opportunity to provide comments and review of the DEIS. We ask that you respond to the questions we've asked and incorporate new scientific information we have presented.

The Lake Whatcom Landscape Plan is a unique opportunity for DNR to work closely with an involved community in crafting a plan that meets the stated objectives: “ensure no significant risk to public health, safety and resources, and tribal and archaeological and cultural resources from forest-management related mass-wasting events²⁰,” and “maintain and restore the sediment regime within the range of natural variability²¹.” These are high standards, yet goals the public expects that the DNR will reach. These are also goals that are fully consistent with the constitution of the state of Washington and with the broad public trust that runs with these lands.

¹⁹ Data sheet for LW Draft Alternative dated 3/25/02, given to Lisa McShane by Candace Johnson, 9/25/03.

²⁰ DEIS – Lake Whatcom Landscape Plan, Objective 1, page 11.

²¹ DEIS – Lake Whatcom Landscape Plan, Objective 2, page 11.

The intent of the legislature, to protect clean drinking water and public safety, is also entirely consistent with the status of the Lake Whatcom lands as state trust lands. For indeed, there is no more important role for these lands than to provide clean drinking water and public safety. These are the highest values of the community; our state trust lands should be managed with those values as management goals, rather than management constraints. We urge you to amend the preferred alternative so that those goals may be met and the broad public trust safeguarded.

Sincerely,

Lisa McShane
Director of Community Relations
Northwest Ecosystem Alliance

Additional Scientific Information

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From: ginny broadhurst <ginnybroadhurst@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 4:18 PM
Subject: lake whatcom

To the SEPA Center,

I am concerned about the future of DNR's logging activities in the Lake Whatcom watershed. The current DEIS seems flawed in some important ways. It's not clear in the DEIS what the DNRs management plan truly will be. I am concerned about unstable slopes in the area and the affect that increased access of machinery and cutting would have in the area. The preferred alternative calls for cutting in ARS #1 unstable slopes. I think that this is a good example of an area where the precautionary approach should be used. It will cost all of us greatly if we end up with slope failures. That should be weighed against the short term revenue gains.

The preferred alternative also allows oil and gas exploration in the Lake Whatcom watershed which is not acceptable activities for the watershed of our drinking water. I hope that the DNR can demonstrate good land stewardship practices and be a model for others to copy.

Thanks for the opportunity to comment.

Ginny Broadhurst

305 N. Forest St.

Bellingham, WA 98225

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SEPACENTER - Lake Whatcom DEIS

From: Bill Hinely <BillHinely@bellinghamcohousing.org>
To: <sepacenter@wadnr.gov>
Date: 10/8/2003 3:20 PM
Subject: Lake Whatcom DEIS

Lake Whatcom DEIS Committee:

Friends, Bellingham is **not** a third world city in which we must sell off our natural resources in order to survive for a few months or years! Instead, we are a city that has been listed by several national publications as **one of the most desirable places in the United States to live.**

Clean water is a necessity for the survival and health of human beings and many other living things. Some cities have signaled their recognition of this fact by fencing off their watersheds to prevent contamination.

I am deeply saddened by the prospect of the continuing **totally unnecessary** degradation of our water supply by practices such as those allowed by the "Preferred Alternative". **None of the alternatives you present propose the kinds of watershed management that are essential to the present and future health of our water supply.**

Prevention is always much less expensive than remediation. By pursuing any of your proposed alternatives, we will bequeath to posterity environmental - and financial - problems as our predecessors have bequeathed to us in situations such as the degradation and contamination of our waterfront.

As a concerned citizen who intends to remain a part of the Bellingham community as long as I live, I strongly urge and beseech you to build your FEIS around the following:

1. The Lake Whatcom Watershed will be managed exclusively for the purpose of providing clean water for the present and future generations of Whatcom County residents.
2. We will immediately take whatever steps are necessary to repair and rehabilitate the human damage we have done to our watershed by reforesting all the logging roads - or converting some into hiking trails and taking whatever other steps are necessary.
3. Only that timber harvesting will be permitted which can be clearly demonstrated to an Interjurisdictional Committee that it is necessary to improve the water quality of Lake Whatcom
4. All activities which negatively impact the quality of water in Lake Whatcom will be prohibited - or phased out as rapidly as possible.

Thank you for your efforts to keep our central water source clean - and please think very seriously about the probable consequences of the FEIS you propose for present and future generations of all life forms in the watershed. Bill Hinely

From: jessie brown <escaphoto@yahoo.com>
To: <SEPACENTER@WADNR.GOV>
Date: Wed, Oct 8, 2003 4:56 PM
Subject: RE: 02-091300

Dear To ever this concerns,
It is not going to help our environment to emplement
Alt 2. I am asking you to consider Alt. 3 as the only
plan we look at for future logging in this area.
As a Glenhaven community member we only have to look
out the window and see what devistaton is left behind
from the past logging. As of yet we have no
environmental impact statements from this past chunk
of logging. Envirnmental speaking for all the
wildlife and vegetation and people, we ask you to
clearly make the desion to only opt for Alt. 3 as it
is the only right and just thing to do for all future
generations of people and wild things.
As for past logging over Glenhaven you do not have a
very good track record, and follow through on
replanting has been a hugh concern to us and future
concerns. Thanks for the comment time.
Sincerely, Jessie Brown and Daniel Wall

Do you Yahoo!?
The New Yahoo! Shopping - with improved product search
<http://shopping.yahoo.com>

From: <Hillengass@aol.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 9:28 PM
Subject: Lake Whatcom Watershed DEIS SEPA FILE # 02-091300

You have my comments from the original PDEIS (EM23), therefore, I will make these very much to the point and not repeat the information in detail as was done in my response to the PDEIS. I find the Preferred Alternative in the DEIS very similar to Alternative #2 in the PDEIS, which was considered UNACCEPTABLE the as does the PREFERRED ALTERNATIVE now.

Having read the comments and responses to the PDEIS and the DEIS, it is very apparent to me that, although you solicited comments from the Public and held Public Meetings, these were solely done to fulfill the process required by the DNR procedures. Comments DID NOT FACTOR into your decision in developing the "Preferred Alternative". Accordingly, I do not believe the PUBLIC's concerns expressed in their comments and at the relative meetings, were taken seriously. As a result of this, I strongly believe the entire DNR Board as well as the Governor should hold a PUBLIC Hearing in Olympia, that would allow for two way discussions of the Public's comments prior to the approval of ANY plan.

Specific Comments Follow:

1) It is imperative that the Interjurisdictional committee, as provided for in the original bill (Senate Bill 6731), be made a permanent Committee to oversee the actions of the DNR in Whatcom County. This Committee must have the authority to issue cease and desist orders to the DNR, until any issue where agreement between the parties can not be achieved is arbitrated by the appropriate Committee of the State Legislature. The Interjurisdictional Committee must be composed of a majority of Whatcom County residents appointed by the Whatcom County Council, the City of Bellingham and Water District #10. The DNR can also appoint members to the Committee, however, they would be NON VOTING members.

2) In the report projected revenues are discussed of approximately \$875,000 which would be obtained from logging activities. No where in the report is any estimate provided of the actual dollars which would be directly returned to Whatcom County. On an optimistic basis, let one assume \$300,000 would be received by Whatcom County. The most current population numbers I have for the County is 167,000 individuals. If we use the currently accepted composition of each residence of 2.3 individuals, this gives us a base number of residences of 72,600. If we divide the number of residences into the optimistic revenue projection of the \$300,000, we get an average return of revenue per residence of \$4.13. If you were to poll the residents of the County as well as the County Council, you would very quickly find that all parties would willing forego this immaterial return to maintain the forests for there use and the use of future generations.

3) One of the most recent logging operations allowed by the DNR is the harvesting of lumber from LOOKOUT MOUNTAIN. If the Elected Officials in Olympia were to personally view the results of this logging operation they would agree that the Blight and Aesthetic Aspects of the operation is unacceptable. The slope logged is now Unstable Land and may well cause a mudslide in Glenhaven and eventually impact the water quality of Lake Whatcom. The amount and quality of the "Replanting" is unacceptable as is the overall cleanup of the area. Is the DNR, and in turn the citizens of Washington State,

prepared to pay for the existing potential damage the instability of this land and that of similar operations will cause? Make no mistake, the LAND INSTABILITY will cause damage to governmental and private lands as well as business functions. The only question is WHEN!

4) I continue to believe the fiduciary responsibility of lands managed for Whatcom County, is to manage them in the "best interests" of the citizens and future generations who will call Whatcom County home. If revenue can be generated through this process, so much the better, however, REVENUE cannot take precedence over the use of this land by the residents of the County. Somehow, the DNR does not see this prospective, however, I am unaware that they have presented this question to the Whatcom County Council.

5) The thinning of forests is and continues to be in the best interests of the forests and wildlife overall. I submit this thinning should be done via helicopter, under strict supervision. To state that thinning means leaving only 8% of the trees per acre, in the area "thinned", is preposterous. MAKE NO MISTAKE, THIS IS JUST A WAY TO CLEAR CUT LANDS UNDER THE AUSPICES OF THINNING FORESTS.

THE CITIZENS HAVE SPOKEN, HOWEVER THE GOVERNMENTAL ENTITY PREPARING THIS PLAN HAS REFUSED TO TAKE THEIR CONCERNS SERIOUSLY. HOPEFULLY THE DNR BOARD, THE STATE LEGISLATURE AND THE GOVERNOR WILL HAVE HEARD THE WILL OF THE PEOPLE, AND WILL NOT ACCEPT THIS PLAN OR ANY SIMILAR PLAN WHICH IGNORES THE LEGITIMATE CONCERNS OF THE CITIZENS THEY HAVE BEEN ELECTED TO REPRESENT.

Respectfully Submitted,

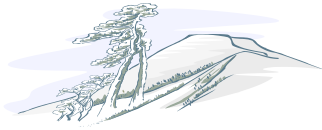
Lance N. Hillengass
472 Sudden Valley
Bellingham, WA 98229-4810
(360) 527-2929
Email: Hillengass@aol.com OR lance@hillengass.us

CC: <beddill@nas.com>, <Caw@openaccess.org>, <helen@whatcomwatch.org>, <Sallywhatcom@cs.com>, <Damm559@aol.com>, <PNUCHIMS@aol.com>, <nwea@ecosystem.org>, <wifeyfour@hotmail.com>, <SandScier@aol.com>

From: Tom Pratum <water@northcascadesaudubon.org>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:04 PM
Subject: Lake Whatcom DEIS

Please accept the attached pdf file as our comment regarding the Lake Whatcom DEIS (NCAS_DEIS_comm.pdf). Please let me know if there are any problems reading the attachment or any questions regarding it.
Thank you for your consideration.

Tom Pratum
North Cascades Audubon Society



North Cascades Audubon Society

www.northcascadesaudubon.org PO Box 5805 Bellingham, WA 98227 info@northcascadesaudubon.org

October 7, 2003

**Board
Members:**

William J. Wallace
Department of Natural Resources
Northwest Region Manager
919 North Township Street
Sedro Woolley, WA 98284

Debbie Craig
President

Re: Comments on the Draft Environmental Impact Statement (DEIS) for the Lake Whatcom Landscape Plan – SEPA File number 02-091300.

Dave Schmalz
Vice President

Dear Mr. Wallace:

Jodi Broughton
Secretary

North Cascades Audubon Society (NCAS) promotes the study and conservation of birds and other wildlife, and works to increase public appreciation for the value of wildlife, plants and the natural environment in order to preserve and protect them. Below please find our comments on the DEIS document that will eventually lead to selection of a final preferred alternative for management of nearly 15,000 acres of state forests around Lake Whatcom. These ecologically significant state forests benefit birds in a number of ways, and are important to the members of North Cascades Audubon Society.

Michele Bodtke
Treasurer

Some of the comments submitted by NCAS for the PDEIS have been addressed in the DEIS, though some have not. Following cursory review of the DEIS document, NCAS has chosen to comment at this time on the following issues:

Jeanie Johnson

Joe Meche

I. Preservation of Cultural Resources

Sally Hewitt

II. Current and Potential Future Suitable Marbled Murrelet Habitat in the Planning Area

III. Current and Potential Future Bird Habitat in the Planning Area

Tom Pratum

IV. Accelerated Harvest of Hardwood Forests in First 2 Decades.

V. Stream Protection: Definition of Stream Types, Channel Migration Zones and Preservation of Riparian Forests Along All Streams

Steve Irving

VI. Unstable and Potentially Unstable Slopes

VII. Retention of Trees in Logging Units

VIII. Rotation Ages for Lands Available for Logging

Paul Woodcock

IX. Protection for Wetlands of All Sizes

X. Maintaining Forest Hydrologic Regimes

XI. Roadless Areas in the Planning Area

XII. Public Perception of Forestry in the Watershed

I. Preservation of Cultural Resources

NCAS supports the continued use of the planning area by Native American peoples and supports the Cultural Resource provisions outlined in Objectives 9 and 10, and full implementation of the protection measures outlined in DEIS Appendix D: Tribal Cultural Resources, *Protection Needs – Distance requirements consistent with the Lummi Nation Cultural Management Plan*. It is not clear from the DEIS document whether these protection measures will be implemented throughout the planning area. NCAS supports the full implementation of all cultural resources protection measures outlined in Appendix D, including those that will not otherwise be protected for other reasons. Moreover, consistent with the TFW Cultural Resource Protection & Management Plan (July 3, 2003), NCAS supports the principle that “resources of significant cultural value should be preserved and protected in their natural state.”

II. Current and Potential Future Suitable Marbled Murrelet Habitat in the Planning Area

NCAS is very concerned over the fate of the marbled murrelet in Whatcom County and throughout its range. The murrelet was listed as Threatened in 1992 and since that time no significant evidence has emerged that would alter the conclusions reached in 1992 that the marbled murrelet is in danger of extinction. Page 53 of the DEIS asserts that the marbled murrelet has likely been extirpated from the planning area, and does not note that an occupied marbled murrelet stand was recently (2002) detected in McCarty Creek, less than 1 mile east of the planning area. It is certainly possible, if not likely, that murrelets currently inhabit older stands in the Lake Whatcom planning area. Furthermore, surveying for marbled murrelets is inherently difficult, and false-negatives (not detecting an occupied stand) are not uncommon. This is one of the reasons the Pacific Seabird Group (PSG) recently revised its survey protocol to require additional surveys and to survey stands with smaller platform limbs (>4 inch diameter) lower to the ground (>33 feet above ground).

Finally, NCAS notes that there is significant controversy over DNR's Habitat Conservation Plan (HCP) marbled murrelet interim conservation strategy in the North Puget Sound Planning Unit (NPPU), and its ability to identify potential suitable habitat for marbled murrelets (letter from Clay Sprague (WADNR) to Ken Berg (USFWS) dated November 18, 2002, in which DNR notes that its forest inventory system (FRIS) is at a scale that may not detect areas of suitable marbled murrelet habitat, such as small patches of late-successional forest (similar to where the murrelet was found in McCarty Creek), and isolated and scattered dominant conifer trees). NCAS is very concerned that remnant patches of older forest on state lands, particularly those in close proximity to saltwater, are not receiving adequate protection to support the preservation of existing murrelet habitat, and the recovery of the suitable habitat in the region. NCAS supports the preservation of all suitable marbled murrelet habitat in the Lake Whatcom Planning area, whether or not a biologist is able to detect a bird as it flies overhead at 65 miles per hour at first sunlight.

III. Current and Potential Future Bird Habitat in the Planning Area

Along with the marbled murrelet, other bird species of concern are identified in the DEIS. Most notably, the planning area was likely occupied by bird species such as the Northern Goshawk, Vaux's Swift, and the Purple Martin. The DEIS (Page 130) notes that under Alternative 2 the northern goshawk would not receive specific protection since the Lake Whatcom Planning area is not designated as Nesting Roosting and Foraging habitat (NRF) for the spotted owl. NCAS supports the preservation of northern goshawk habitat, especially for active nests in the planning area.

NCAS also notes that management for species associated with early-seral conditions are not of concern in the planning area "as there is an abundance of this habitat condition on a larger landscape level" (DEIS Page 132). The need across the planning area is to develop older forest conditions, which are lacking in the larger landscape. The development of older forest conditions across the planning area is consistent with Objective 6 on Page 21 to maintain and restore habitat to "benefit native fish and wildlife species, particularly those identified in WDFW priority and habitat species (PHS)", most of which require older forest conditions. NCAS supports the development of older forest conditions across the planning area, commensurate with the strategies identified in Alternative 3 (rotation ages of 140 years, retention levels of 25%).

IV. Accelerated Harvest of Hardwood Forests in First 2 Decades.

All alternatives call for "accelerating the harvest of mature and over-mature hardwood stands on sites better suited for conifers" (Objective 12). However, hardwood forests play an important role for many species of wildlife (one particular stand is discussed on page 55), including neo-tropical migrant birds, and are also important for soil development on disturbed sites. Further, because of their shorter lifespan than conifers, hardwoods will likely provide the bulk of snags and down woody debris in the short-term, elements of the forest whose densities are currently relatively low (DEIS Page 52). For these reasons, NCAS does not support an aggressive hardwood conversion program in the first 2 decades of operation, and supports a more moderate rate of harvest of both hardwoods and conifers throughout the 200-year planning horizon.

V. Stream Protection: Definition of Stream Types, Channel Migration Zones and Preservation of Riparian Forests Along All Streams

NCAS notes that in the summary of the DEIS document (Page 3), buffers are given as 100 feet on perennial streams and 33 feet wide on seasonal streams. NCAS also notes that in the SEPA addendum this is changed to read "100 feet on Type 4 streams and 33 feet on Type 5 streams." However, the definition of Type 4 and 5 streams is not given in the DEIS document nor the SEPA addendum. The definition of Type 4 streams is given in the DNR HCP (Glossary, page 16):

"Segments of natural waters which are not Type 1,2, or 3, and for the purpose of protecting water quality downstream are classified as Type 4 water upstream until the channel width becomes less than 2 feet in width between the ordinary high-water marks. These may be perennial or intermittent."

NCAS supports the continued use of the DNR HCP definition, permanently, for the Lake Whatcom Landscape Plan. We do not support any efforts to change this definition.

Regarding channel migration zones, NCAS supports the protection of channel migration zones on Type 1-4 streams, with the goal of ensuring that as a channel migrates, there will always be a forest adjacent to its flowing water. It is not clear that leaving trees within the 100 year floodplain will capture the areas that the channel may migrate to. For this reason, NCAS supports the use of a method to delineate the channel migration zone that will capture the areas that the channel may migrate to over the long-term.

Finally, NCAS supports strategies for streams and riparian areas that protect riparian forests along all streams commensurate with the protections provided in Alternatives 3. These measures are consistent with the low-risk proposal submitted to the Forest Practices Board to restore salmon habitat and protect water quality in Washington's forest environment (Washington Environmental Council & National Audubon Society (1999)).

VI. Unstable and Potentially Unstable Slopes

NCAS supports the prohibition of new road construction and timber harvest on all unstable slopes. NCAS also supports a prohibition on new road construction and timber harvest on potentially unstable slopes to ensure no significant risk to public resources and safety (as described in Objective 1 of the DEIS). NCAS supports leaving edge buffers adjacent to unstable slopes to protect these slopes, and the trees that are growing on them, from the effects of severe winds and retention of excess water.

NCAS does not support the provision in Alternative 3 to allow for 50% removal of trees from potentially unstable slopes. This position is supported by the comments of Dr. David Montgomery in his review of the PDEIS for Lake Whatcom:

"I know of no studies that have demonstrated that a 50% partial cut on potentially unstable slopes (such as hollows, headwalls, and slopes steeper than 70% as they are defined in the Draft E.I.S.) would *"ensure no significant risk"* of landsliding from timber harvest. To the contrary, an analysis of the effect of root reinforcement on slope stability recently published in the Canadian Geotechnical Journal (Schmidt et al., 2001; a study which I was a co-author on), found that spatial variability in root strength – such as one might anticipate would result from a partial cut – was associated with those potentially unstable sites that generated rapidly moving, highly destructive debris flows in the Oregon Coast Range. In other words, the partial cut alternative for managing potentially unstable slopes is an experiment that carries with it an unknown element of risk, a risk that recent research suggests may not be minimal. Therefore, I cannot conclude that Alternative 3 would meet the stated objective of not significantly elevating the risk of management-related landsliding."

VII. Retention of Trees in Logging Units

In comments submitted for the PDEIS, NCAS supported reference to the minimum retention levels suggested for Forest Stewardship Council (FSC) certification by the Scientific Certification Systems (SCS) audit of DNR state land management in Western Washington (SCS, 2001). However, this reference does not appear in the DEIS document. NCAS continues to support this level of retention (25%) in logging units, as well as immediate FSC certification for state forests in the planning area. NCAS also provided the following comment on the PDEIS, which is not noted in the DEIS and is still supported by NCAS: "On Page 229 of the PDEIS, a question is raised as to which trees would be retained in this alternative. NCAS supports the retention first of dominant, then co-dominant trees, snags and downed logs in order to best maintain and enhance the forms and functions of older forest ecosystems."

VIII. Rotation Ages for Lands Available for Logging

The 60-year rotation age in Alternative 2 does not allow for the development of mature forest conditions (see also comment XII below). Although some locations within the planning area will not be available for logging (and will therefore develop older forests), lands that are logged should contain old forest structures. NCAS supports rotation ages between 120-200 years for conifer forests in the planning area.

IX. Protection for Wetlands of All Sizes

The PDEIS describes wetlands as "some of the most important fish and wildlife habitat in forestlands" where primary productivity rates "are among the highest in the world" (Page 109). Further benefits of wetlands include "sediment trapping, water purification, stormwater detention and seasonal streamflow augmentation" (Page 109). Given the ecological and hydrologic value of wetlands, and the seasonal low flow conditions in many of the tributaries, NCAS supports protection of all wetlands in the planning area commensurate with that provided in Alternatives 3 (with respect to roads and timber harvest).

X. Maintaining Forest Hydrologic Regimes

Pre-settlement conditions in the planning area likely included mature forests across much of the landscape. These mature forests helped regulate the release of water through the watershed. Conversion of older forests to early seral stages has altered the hydrologic regimes in many sub-basins in the planning area. The discussion in the DEIS on hydrologic change (Page 50) centers on “Hydrologic maturity thresholds” which are relative to current conditions in the planning area. However, the objective for this important watershed attribute is to “maintain and restore the forest hydrologic regime for each sub-basin *within the range of natural variability*” (emphasis added). We did not find any analysis regarding the “range of natural variability” in the DEIS document. Therefore we have insufficient information with which to formulate a position on this topic, except to say that NCAS supports the restoration of mature forest conditions to maintain the forest hydrologic regime within the range of natural variability.

XI. Roadless Areas in the Planning Area

The PDEIS recognizes roadless areas in the planning area to be of particular significance to wildlife, and identifies their geographic locations. NCAS supports preservation of these areas as roadless. Any removal of trees within these roadless areas should be done without the construction of new roads.

XII. Public Perception of Forestry in the Watershed

As mentioned above (VIII), the attempt to get all harvestable areas in the watershed on a 60 year rotation, along with the current forest age makeup of these areas, dictates that much of the harvest in the preferred and no-action alternatives will occur in the first 100 years of the plan. For example, according to DNR modeling, there will be 75% more area clear-cut (or regeneration harvested) in the first 20 years, and 125% more area clear-cut in the second 20 years of the preferred plan than the average shown in the DEIS would indicate. Not only does this violate the attainment of mature forest conditions we feel are necessary in the watershed, it will also create considerable tension between the agency and this community. The perception will be that there is no difference between having a landscape plan and not having one. One only need harken back to the late 1980's and early 1990's to see the type of litigious atmosphere this is likely to create. We would like whatever plan is adopted to actually work and be acceptable to the community. It is highly recommended that the DNR place a ceiling on the amount of harvest that can occur in any given year and that this ceiling be explained clearly to the public prior to the adoption of the FEIS. We believe the maximum yearly level of harvest needs to be substantially different in the preferred alternative relative to the no-action alternative in order for the public to accept the former as being more protective.

Thank you for considering these comments as the Lake Whatcom DNR Landscape Planning Committee and DNR select a final preferred alternative for the Lake Whatcom EIS.

Please feel free to contact me with any questions or comments.

Sincerely,

Tom Pratum
Conservation Committee
North Cascades Audubon Society

From: <jcurley4@juno.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:41 PM
Subject: Lake Whatcom DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

As a citizen who drinks water from Lake Whatcom, I'd like to thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

Dear DNR:

Please change your "preferred alternative" to include NO road building or logging on unstable slopes, & to allow NO oil and gas exploration in the Lake Whatcom watershed.

Please monitor the impacts of logging on streams.

Please include a structure within the plan for changing management according to science & monitoring results.

Please in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to Protect both public Safety and the Quality of a critical drinking water reservoir.

Sincerely, Jayme Curley 1008 W. Toledo 98229

Sincerely,
Jayme Curley
jcurley4@juno.com
1008 W. Toledo
Bellingham, WA 98229

cc:

From: <erin_pat@memes.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:43 PM
Subject: Put environment to the forefront for Lake Whatcom

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

Dear Department of Natural Resources,

I am writing to ask that the DNR amend their preferred alternative in the recently released Lake Whatcom Landscape Plan DEIS. That alternative should be changed to

- * reflect the directives of the Lake Whatcom bill, E2SSB 6731, passed by the legislature to protect drinking water and public safety in the watershed,
- * prohibit road building and logging on unstable slopes,
- * keep as much of the state Lake Whatcom lands in various seral forest stages as possible, especially favoring mature forest,
- * disallow regeneration clearcuts in the watershed,
- * call for the protection of these lands as vibrant, healthy watershed,
- * recommend to the legislature that it advise the agency to consider the trust responsibilities to the well-being of the general public, not just the trust beneficiaries, as a priority in managing the watershed,
- * halt oil and gas exploration in the Lake Whatcom watershed,
- * monitor selective logging impacts to streams and wetlands, and include a structure within the plan for changing management according to science or monitoring results, and
- * establish an inter-jurisdictional review committee with advisory and oversight powers.

The 4% of the planning area in the watershed that is 100 years or older, as inventoried in the DEIS, should be left standing, for legacy's sake. These stands are on their way to old growth and are worth their weight in gold for that reason. I would also like to comment that though rimmed by human habitation, as pointed out in the DEIS, the watershed lands provide a significant stepping stone to Chuckanuts and other local areas. This factor should not be downplayed by the agency in its forest management considerations.

I would also respectfully remind the DNR that slope failures and significant debris flows are not just sporadic results of post glaciation soils, as stated in the DEIS; landslides are far more likely to occur on slopes cleared of trees. The large landslide which occurred in 1984 and destroyed several homes on the lakeshore below occurred below a then-recent clearcut.

As a member of the local mycology association, I would also like to stress a point about mushrooms which are harvested commercially and recreationally in the planning area. Chanterelles, arguably the most valuable and most harvested mushroom, are mycorrhizal, they live on Douglas fir and western hemlock fine roots. They do not exist as a species in isolation from forest trees, and they cannot grow in clearcuts. It's estimated that they require stands of at least 40 years and older to fruit and produce. Stand coverage should be maintained in this age and older age categories, for this and many other reasons beyond a mushroomer's personal preferences! Allowed to thrive and protected from overcutting, the Lake Whatcom watershed could become a haven for these species, and many other species of wildlife.

As the DNR stresses, "the harvest of timber is subject to economic, environmental and regulatory considerations." I urge the agency to put "environmental considerations" in the forefront of their preferred alternative.

Thank you for the opportunity to comment.

Erin Moore

Sincerely,
Erin Moore
erin_pat@memes.com
2835 Broadway
Bellingham, WA 98225

cc:

From: <claw3@aol.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:44 PM
Subject: Comments on the Lake Whatcom DEIS

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan. SEPA File no. 02-091300.

As Stewards of the land, I would like you to pause and consider: You know that the surest way to destroy a pristine forest is to build a road through it.

Once a road is bulldozed through a previously untouched area, a flood of external contaminants find their way in too.

Animals scatter and perish. Habitat disappears. Trees tumble and our natural treasures, the forests that took centuries of nature's magic to perfect, are lost to children, forever.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to the alternative 4 plan recommend by the Sudden Valley Board of Directors. Take into consideration the Global warming effect on type 4 and type 5 steams. Inform the people as to what types of chemicals and pesticides will be used. Do not allow road building or logging on unstable slopes, or allow oil and gas exploration in the Lake Whatcom watershed. Monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results.

Re-Treeing as needed.

Put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices, such as logging on potentially unstable slopes.

Respect First Nations' cultural issues by not allowing silt and polluted storm water to filter down to once-pure streams.

I encourage you to make this the preferred alternative of the people of the watershed. in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Charles and Charlene Law
claw3@aol.com
1514 Sudden Valley
Bellingham, WA 98229

cc:

From: <akmrockstar@yahoo.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:45 PM
Subject: Lake Whatcom DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

I would like to thank you for taking the time to listen to comments such as mine concerning the DEIS for the Lake Whatcom Landscape Plan.

I am writing for three reasons in particular. The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. First of all, the DNR must change their preferred alternative so that no road building or logging on unstable slopes is allowed. In the past, landslides have devastated the environmental quality of the lake. Logging on unstable slopes in the watershed puts the lake at risk once again. Second, there should be no oil and gas exploration in the Lake Whatcom watershed as this is a sensitive area. And third, the impacts of logging to streams should be monitored and dealt with according to monitoring results. An inter-jurisdictional committee may help the ongoing logging practices in the watershed stay safe and low-risk.

As a concerned citizen of Bellingham, I ask that you consider these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Alissa Martz
akmrockstar@yahoo.com
3838 S Bay Drive
Sedro-Wooley, WA 98284

cc:

From: <roddpemble@hotmail.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:45 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

Dear DNR Project Manager:

On behalf of myself, my wife and children, and my community I would like to comment on the DEIS for the Lake Whatcom Landscape Plan. Allow me to speak bluntly, as a citizen and taxpayer who is tired of watching our community participate responsibly in one public policy process after another, only to have their concerns overridden by agency decisions.

The Lake Whatcom bill, E2SSB 6731, initiated and supported by the people of our community and county, was duly passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. Having attended the scoping meetings, and now reviewing your response to that clear legislative intent, I have to ask, "What part of NO don't you understand?"

The "preferred alternative" may claim to follow the legislative intent, but I contend it has been written under duress by staff who never agreed with the legislative intent, and thus the proposal gives lip service to legislative direction while maintaining the status quo of destructive road building, clear cutting, and destruction of stream and water resources.

Based on sound scientific review and prudent long-range public policy, a truly preferential plan should include the following features.

- 1) NO road building or logging on unstable slopes. Given local hydrogeology and the impossibility of guaranteeing perfect on-site practices, avoiding unstable slopes is just common sense. DNR's plan to allow clearcutting on such slopes is just ludicrous.
- 2) NO oil and gas exploration in the Lake Whatcom watershed. Are you kidding me? Our elected officials are struggling with public calls to remove 2-cycle engines and their pollution from Lake Whatcom while your agency still supports allowing drilling for and production of petroleum resources in the watershed?
- 3) NO yarding of logs across or along streams or road cuts allowed in riparian zones along any streams. Again the legislative wording is clear, that regardless of stream size and type, riparian zones are to be protected across the board. The legislative language is clear - FOLLOW IT.
- 4) Monitor the impacts to streams of all logging and include a structure within the plan for changing management according to science or monitoring results. The supposed preferred alternative would have the public trust a DNR employee to perform this monitoring? The same DNR who has consistently stiff armed public concerns in the watershed? We'd like some more objective oversight, thank you very much.
- 5) Given serious lapses in the past on the part of DNR staff, put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices. We, the people who drink the water, must have a constant presence and authority through such a committee.
- 6) Develop real restoration procedures and timelines, especially for old roads, which scientific opinion is clear are the prime source of existing problems with water quality, mass wasting, and ecological harm to flora and fauna. The preferred alternative mumbles about this problem without specifying detailed procedures and criteria for remediation and restoration. Allowing the watershed to continue to deteriorate, albeit more slowly than under prior DNR practices, is NOT acceptable. Protecting, stabilizing, and rebuilding the ecosystem and its functions must be the guiding principles.

Without these substantive changes to the preferred alternative, your claim that the plan protects public

safety and the quality of a critical drinking water reservoir will melt away as destructively as Lake Whatcom snowpack under December rain.

Sincerely,
Rodd Pemble
roddpemble@hotmail.com
2915 Cedarwood
Bellingham, WA 98225

cc:

From: <TurcC583@newschool.edu>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:46 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

The Lake Whatcom bill, E2SSB 6731, was passed by the legislature to protect drinking water and public safety in the Lake Whatcom watershed. I am writing to ask that the DNR change their preferred alternative to include no road building or logging on unstable slopes, to allow no oil and gas exploration in the Lake Whatcom watershed, to monitor the impacts of logging to streams and include a structure within the plan for changing management according to science or monitoring results, and to put in place a strong, inter-jurisdictional committee with the authority to stop risky forestry practices.

I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Cruz Turcott
TurcC583@newschool.edu
4308 5th AVE NW
Olympia, WA 98502

cc:

From: <timmchugh@earthlink.net>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:46 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

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1111 Washington ST SE
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Many people I've met from other parts of the country are appalled at the fact that we've even allowed any development and logging in our drinking water reservoir. The DNR didn't even include their actual logging plans for the watershed in their DEIS. How are they to evaluate the environmental impacts if they don't state what the action is? Logging and road building on unstable slopes is an unacceptable risk to public safety and drinking water. Again, do not allow road building on unstable slopes or oil and gas leases in our watershed!!

On behalf of my wife Kristina, and two sons Casey and Morgan, I thank you for in advance for making these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Tim McHugh
timmchugh@earthlink.net
2914 South Avenue
Bellingham, WA 98225

cc:

From: <rawal@earthlink.net>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:46 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

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I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Randy Walcott
rawal@earthlink.net
1816 West North St.
Bellingham, WA 98225

cc:

From: <crharris00@hotmail.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:48 PM
Subject: Lake Whatcom DEIS, File No. 02-091300

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

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I encourage you to make these final changes to the preferred alternative in order to protect both public safety and the quality of a critical drinking water reservoir.

Sincerely,
Courtney Harris
crharris00@hotmail.com
777 Chuckanut Shore Rd.
Bellingham, WA 98229

cc:

From: <senoreel@hotmail.com>
To: <sepacenter@wadnr.gov>
Date: Wed, Oct 8, 2003 10:47 PM
Subject: Protect Lake Whatcom, DEIS comments

Dept. of Natural Resources
SEPA Center, Lake Whatcom DEIS
1111 Washington ST SE
PO Box 4-7015
Olympia WA 98504-7015

To whom it may concern:

Thank you for this opportunity to comment on the DEIS for the Lake Whatcom Landscape Plan.

As DNR trust lands constitute 48 percent of Lake Whatcom's watershed and produce 35 percent of the lake's inflow, 96 percent of that quantity as surface runoff. This large presence gives the department the greatest controlling influence on the ecosystem and drinking water quality of any jurisdiction, a position demanding its responsibility in ensuring no further degradation originating in its zone. Since deterioration has occurred and is well documented, DNR is further obligated to perform restoration projects to reverse degradation trends. In the face of DNR's key role in the watershed and its hydrology and the recent history of water quality and ecological losses, the Preferred Alternative would allow 52.7 percent of the trust lands definitely to be open to timber harvesting, while up to an additional 19.7 percent in unstable areas could be logged, for a total of more than 72 percent of DNR's property. Clear cutting nearly 50% of the logging (43 of 91 acres harvested annually). And I've seen research that shows DNR's actual plan for harvesting differs from what is stated. With its 48 percent ownership of the watershed that means that as much as 35 percent of the entire lake catchment could eventually be mostly stripped of forest cover. If the average clear-cutting pace prevails overall, ultimately 28.6 percent of the lake's watershed could be clear cuts (based on the plan differing from the DEIS), or 16.3 percent taking the figures in the DEIS. The DEIS does not report how much of the DNR land has been logged previously, let alone impacts from highly disruptive road building. The Preferred Alternative is predicated on the construction of 43 miles of new logging roads, doubling the 44 miles now active and adding to the 42 miles of orphaned roads, which are the primary trigger of mass wasting episodes on timber harvesting lands. Thus, DNR should institute a strong program to mitigate these sources quickly, instead of taking the non-committal approach of the Preferred Alternative. My other disagreements with the plans put forward and preferred, and suggestions for their improvements:

DNR must state what their true management plan is and analyze the environmental impacts of their actual logging plan.

The DEIS states there will be no harvest on unstable slopes, yet the preferred alternative allows logging on ARS #1 unstable slopes.

The preferred alternative allows oil and gas exploration in the Lake Whatcom watershed, which should not be allowed.

Only Alternatives 4 or 5 met the legislative intent of protecting clean drinking water and public safety. Most citizens requested one of those as well. Neither of those alternatives came forward for review in the DEIS.

It is nice to see that alternative 3 has larger buffers on streams and longer rotations than currently exist. Unfortunately, it also allows partial cuts on potentially unstable slopes, and this is not acceptable. The Preferred Alternative allows 100 acre clearcuts – at an average of 48 acres a year – but it stops logging on nearly half the DNR lands. The alternatives state that there will be no logging on unstable slopes, yet logging is allowed on some unstable slopes (ARS 1), a problem the DNR could correct in the FEIS. It also relies on on-the-ground assessments by an Inter-Jurisdictional Committee.

It is critical to watershed and neighborhood protection that a strong, consistent Inter-Jurisdictional

Committee have the authority to stop risky timber sales and roads and that those timber sales, because they are revenue producing, pay the legitimate costs of that committee (including reimbursing citizens who serve on the committee for their time away from work and reimbursing the City and County for contracting).

The Preferred Alternative fails to apply fully and comprehensively the key objectives as stated by the legislatively constituted Landscape Planning Committee. The unique status of a drinking water reservoir warrants strict attention to these objectives in the development, assessment, and adoption of an alternative. Under the Preferred Alternative, reconstruction in unstable or potentially unstable locations would be determined according to evaluation by a "DNR specialist." Independence of the DNR's own employee is doubtful in making these sensitive determinations. An inter-jurisdictional committee and external specialists would be able to advance recommendations, but they need only be "considered" and not necessarily followed. The DEIS thus gives no sense of how and to what degree, or even if, the department would "limit" old road reconstruction on unstable slopes.

The law states that establishing riparian management zones along all without distinguishing among stream types. However, these zones along Type 5 streams can be cut for roads and yarding corridors. Also, buffer widths would be less for stream Types 4 and 5 than for Types 1-3.

The first eight objectives set by the Lake Whatcom Landscape Planning Committee should be an absolute foundation for guiding the EIS process and devising the management strategy for the watershed's forests.

The only provisions of the Preferred Alternative that could be considered to be restorative are for mitigation work on orphaned roads where a clear risk to public safety of potential for resource damage exists. Also, a plan to replace fish-blocking culverts has no commitment to a specific level or timing of action and takes no account of the cumulative effects of past poor practices. Blocking culvert replacement would be carried out only during planned management activities or during implementation of the Road Maintenance & Abandonment Plan." There is no commitment to replace all blocking structures expeditiously, as there should be to achieve true fish passage restoration. Alternative 3, in contrast, gives important commitments to orphaned road mitigation and blocking culvert replacement within 3 years of the Plan's adoption.

The Preferred Alternative provides no buffer zones for wetlands smaller than 0.25 acre in area. There was no analysis of how much impact of this type the Preferred Alternative will produce.

The issue most threatening to drinking water quality from the Lake Whatcom source is increased phosphorus loading, which stimulates algal eutrophication. Phosphorus enters water when runoff erodes soil and when both soil and vegetation enter water through mass wasting. Sediment phosphorus build up will continue unless inputs decline these additions greatly raise phosphorus concentrations.

The only way that the share of deterioration from forest exploitation can be reversed is through some combination of restoration of past damage, limitation on new disturbance, and implementation of substantially improved practices to mitigate what new disturbance does occur. This philosophy is embedded in the objectives but was not applied in developing the Preferred Alternative. There was no analysis of what is necessary to stop degradation and what strategies of restoration, limitation, and better practices can contribute to this end.

Thank you for considering my comments for the record.

Ted Matts
Bellingham, WA
360-527-3386

Sincerely,
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1715 34th street
Bellingham, WA 98229

cc: